

## INFORMATION AND RECORDS RETENTION POLICY

- 1 This policy informs pupils and parents about the school's procedures for reviewing and destroying records. In this policy “the school” means The Corporation of King's College School and includes:
  - 1.1 King's College School;
  - 1.2 King's College Junior School;
  - 1.3 Wimbledon Common Preparatory School.

The policy should be read in conjunction with the school's privacy notices.

- 2 The school will keep information about parents and pupils for as long as it needs to, for example, in order to educate and look after its pupils. The school will keep some information after pupils have left the school, for example to assist with complaints handling.
- 3 In exceptional circumstances, the school may keep your information for a longer time than usual but would only do so if it had a good reason and in accordance with current data protection legislation.
- 4 The school can keep information for a very long time or even indefinitely if it needs this for historical, research or statistical purposes. For example, if the school considers the information might be useful for someone who wanted to write a book about the school.

### **Independent Inquiry into Child Sexual Abuse (“the inquiry”):**

- 5 The inquiry published its final report on 20 October 2022. It made a clear recommendation that any data relating to child sexual abuse allegations should be kept for 75 years.
- 6 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. Some documents may need to be kept for longer than the retention periods listed in this policy if they concern information which might be relevant. The school should therefore review documents in light of the inquiry report before undertaking routine deletion or destruction.
- 7 Schools are also being advised by the Independent Schools' Bursars Association to apply the same retention period of 75 years to any data relating to other forms of abuse including physical or emotional abuse and neglect.

Please speak to the bursar if you have any questions about this policy.

	<b>Record</b>	<b>Retention period</b>
<b>I</b>	<b>Pupil files</b>	
I.1	Admission Registers (however held)	6 years from date of last entry.
I.2	Attendance/absence registers (however held)	6 years from date of last entry.
I.3	Child Protection files	DOB of the pupil + 75 years
I.4	Medical records	<p>DOB of child + 24 years</p> <p>OR 6 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.</p> <p>The 24 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 School. The longest of these limitation periods is 6 years, albeit that some periods can be extended by the courts</p>
I.5	Counselling records	<p>DOB of child + 24 years; OR</p> <p>6 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</p>
I.6	Pupil files (including public examination scripts, marks, results)	<p>DOB of the pupil + 24 years</p> <p>OR</p> <p>6 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</p>

	<b>Record</b>	<b>Retention period</b>
I.7	Internal examination scripts, marks, results assignments, timetables	<p><u>Scripts:</u></p> <ul style="list-style-type: none"> <li>- From weekly or monthly tests, keep until the end of the next term.</li> <li>- From termly or yearly tests, keep until the end of the next academic year.</li> </ul> <p><u>Marks and Results:</u></p> <p>If the purposes 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 for retention of pupil files above.</p> <p>If the purposes of the test is for general academic performance then keep marks and results for 7 years after the child has left the school.</p>
I.8	Special Educational Needs files, reviews and Individual Education Plans	<p>DOB of the pupil + 31 years</p> <p>OR</p> <p>6 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</p>
I.9	Statement of Special Education Needs (SEN) and Education Healthcare (EHC) Plans	Statements of SEN including appendices and EHC Plans should never be retained once the pupil has left the School
I.10	Letters authorising absence	3 years from date of the last entry on the attendance register.

	<b>Record</b>	<b>Retention period</b>
1.11	Documents that are required to be retained for each migrant enrolled under Tier 4 (General) Student or Tier 4 (Child) Student visas	Through the period of sponsorship and for whichever is the shorter period of either: <ul style="list-style-type: none"> <li>• 1 year from the date that the School ends sponsorship of the Tier 4 student, or</li> <li>• if the Tier 4 student is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents</li> </ul>
1.12	Any other data held on Schoolbase database	In accordance with the retention period for the specific category of data or if data does not fall into specified category DOB of the pupil + 24 years OR 6 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
<b>3</b>	<b>Permissions</b>	
3.1	Parental permission slips for school residential trips – where there has been no major incident, accident, injury or near miss involving anyone on the trip	Conclusion of the trip + 1 month
3.2	Parental permission slips for school trips – where there has been a major incident, accident, injury or near miss involving anyone on the trip	DOB of the pupil involved in the incident + 24 years OR 6 years from the date 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

	<b>Record</b>	<b>Retention period</b>
<b>4</b>	<b>Admissions/ Fee Records</b>	
4.1	Registration form, Acceptance form & parent contract and new pupil confidential information sheet	The academic year the pupil turns 25.
4.2	Admissions documents relating to applicants who did not join the School	<u>From date of application</u> <u>Senior school</u> 1 year for applicants to the sixth form 3 years for 11+ applicants 2 years for applicants into other year groups <u>Junior school</u> 5 years
4.3	Financial information in respect of fees	6 years from date of leaving the School except for direct debit mandate forms which should be retained for 17 years from the date of the mandate
4.4	Financial information in respect of additional charges on school trips.	6 years from date of leaving the School
4.5	Bursary applications/forms	While at school
<b>5</b>	<b>Health and Safety</b>	
5.1	Accident reports including first aid/accident book	DOB of the pupil involved in the incident + 21 years or: 3 years from the date of an accident which may become contentious if the pupil was already 18 years old at the date of the accident.

	<b>Record</b>	<b>Retention period</b>
5.2	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own record	DOB of the pupil involved in the incident + 21 years 3 years from the date of an accident which may become contentious if the pupil was already 18 years old at the date of the accident.
5.3	Incident investigations and reports, risk assessments and other relevant documents where there has been an accident or incident	DOB of the pupil involved in the incident + 21 years or 3 years from the date of an accident which may become contentious if the pupil was already 18 years old at the date of the accident.
<b>6</b>	<b>Insurance</b>	
6.1	Correspondence relating to claims/ renewals/ notification re: insurance or relating to specific accidents or incidents	7 years generally If the incident involved a pupil - DOB of the pupil involved in the incident + 21 years Or 7 years from the date of an incident which may become contentious if the pupil is already 18 at the time of the incident. Disease claims or where there have been allegations of abuse – indefinitely

<b>7</b>	<b>Investigations Reviews and Inquiries</b>	
	<p>Internal reports and investigations into accidents / incidents</p> <p>Copies of reports submitted to external agencies / regulations such as ISI, HSE, Local Authority, Charity Commission etc</p>	<p>3 years where the investigation/inquiry has been necessitated as a result of a specific incident and there is a risk of enforcement action, criminal prosecution or civil claim, 3 years from the date of the report.</p> <p>Where this relates to a pupil DOB +21 years or 3 years from the date of the incident if the pupil was 18 years old at the date of the incident.</p>
7.2	External reports and investigations for inquests and public inquiries	<p>At least 3 years.</p> <p>Where this relates to pupil DOB +21 years) or 3 years from the date of the incident if the pupil was 18 years old at the date of the incident.</p>
7.3	Documents relevant to IICSA including historic child protection policies and procedures.	indefinitely
<b>8.</b>	<b>Alumni</b>	
8.1	General correspondence, membership forms etc.	Indefinitely, as this is part of the institutional relationship with the individual. People would expect that the knowledge would be retained.

8.2	Relationships to other educational institutions	Indefinitely, as this is part of the institutional relationship with the individual. People would expect that the knowledge would be retained.
8.3	Documents relating to event attendance	Indefinitely, as this is part of the institutional relationship with the individual. People would expect that the knowledge would be retained.
8.4	Documents related to giving history	Indefinitely, as this is part of the institutional relationship with the individual. People would expect that the knowledge would be retained.
8.5	Relationship to the school and others in the school community	Indefinitely, as this is part of the institutional relationship with the individual. People would expect that the knowledge would be retained.
8.6	Relationships to employers	Kept for 10 years, then reviewed. Retained further if still true, and relevant to the relationship with the school e.g. interested in attending careers and networking events.
8.7	Documents related to fundraising approaches	If the ask is successful, up to six years after the date of the donor's last gift to the school. If not, one year.
<b>9</b>	<b>Archive material</b>	
9.1	Records which do not contain personal data, for example, old photographs of School buildings, title deeds etc	Can be kept indefinitely
9.2	Records relating to a number of pupils, or the School generally, such as old class photographs, pupil lists for any given year, prospectuses, newspapers cuttings etc	<p>Can be kept indefinitely provided that the school is satisfied:</p> <ol style="list-style-type: none"> <li>1) There is a legitimate interest in doing so</li> <li>2) Keeping the record is necessary for that legitimate interest</li> <li>3) The legitimate interest is not overridden by the interests, rights or freedoms of the individuals concerned.</li> </ol> <p>The school should document its decision based on the three part test above.</p>
9.3	Records concerning specific pupils. For example, a poem written by an exceptionally gifted pupil	Can be kept indefinitely subject to the legitimate interest test above being satisfied and documented.



		For example, for historical research purposes such as if the school wished to retain the essays written by pupils which were submitted to an essay competition about growing up in the 2010s. Please note that this does not apply to more routine pupil records
<b>10</b>	<b>CCTV Videos and Photographs</b>	
10.1	CCTV footage	31 days
10.2	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.
10.3	Photographs or videos of pupils taken for marketing reasons e.g. photographs for use in the School prospectus or a video of pupils on the School's website	These photographs and videos should be retained for as long as they are required for the purpose for which they were taken. Images retained for historical reasons are dealt with in paragraph 9 above.
10.4	Photographs 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	These photographs and videos should be retained for as long as they are required for the purpose for which they were taken. Images retained for historical reasons are dealt with in paragraph 9 above.