

Information and Records Retention Policy

Inspired Learning Group

August 2024

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Introduction

- 1 This policy sets out a structured approach to reviewing and destroying records in relation to Inspired Learning Group (ILG). For the purposes of this policy, all ILG settings and Head Office are included.
- 2 The retention period for each type of record is shown in the appendix. In addition, data protection legislation makes it unlawful to keep the information when it is no longer needed for the purpose for which it is held. This requirement allows discretion and may vary according to the circumstances, but in practice it means that ILG should promptly destroy the record once the retention period in the appendix has been reached (subject to the paragraphs below).
- 3 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. ILG will refer to its insurance policies and legal advice may be sought in these circumstances.

Run off period

- 4 ILG 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 ILG keeps information for six months after the retention period set out in the table has come to an end.
- 5 Emails should be kept according to the retention periods outlined in the table. Routine emails which do not fall into any of the categories in the table can be filed if they need to be retained, or deleted after six months.

The Independent Inquiry into Child Sexual Abuse (IICSA) and insurer requirements

- 6 IICSA has made a recommendation to a range of institutions regarding records relating to the care of children. Any data relating to child sexual abuse (CSA) allegations should be kept for 75 years, but subject to regular review.
- 7 If requested by ILG's insurers, certain categories of documents may be kept for longer time periods.

Secure destruction

- 8 Personal data will be securely deleted or destroyed at the end of the relevant retention period.
- 9 Each setting and Head Office is responsible for ensuring that records are held securely whilst in use, and disposed of appropriately. If necessary, advice can be sought from the IT Department or the data protection lead within the setting or Head office.
- 10 Each setting and Head Office is responsible for ensuring that any electronic devices are wiped securely before they are disposed of or recycled. This can be done remotely if required.
- 11 Paper records will be disposed of through secure shredding, either via the setting or using an outside contractor.

- 12 ILG may hire contractors to delete or dispose of personal data, for example, by wiping and disposing of electronic devices or by shredding paper. In these cases, the appropriate due diligence must be carried out on the contractors to check that they are complying with their obligations and ensure that written confirmation is in place.
- 13 ILG has measures in place to halt the deletion of information promptly should it need to be retained beyond the normal retention period. For example, if information may be required in relation to a legal claim.
- 14 Staff are allowed to use their personal devices for work so long as such use complies with ILG's requirements. These are set out in the Employment Manual, the Information Security policy, the Staff Code of Conduct and/or Acceptable Use policy.
- 15 ILG uses contractors to process personal data on its behalf (called data processors under data protection law). Examples of the data processors used by ILG currently include SIMS, iSAMS, Family, Netsuite and PS People. Details are included on the relevant Personal Data Inventories or Privacy Notices. Senior leaders are responsible for ensuring that any personal data held by processors are also securely destroyed.

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
1	Pupils			
1.1	Admission registers (however held)	Three years from the date of the last entry	Review for further retention in the case of contentious dispute SHRED / DELETE	Yes
1.2	Child protection records	DOB of the pupil + 70 years	Review for further retention in the case of contentious dispute SHRED / DELETE Notes: Child protection information must be copied (so that ILG retains the original) and sent under separate cover to the pupil's educational file to the Designated Safeguarding Lead (DSL) at the new setting whilst the child is still under 18. Settings should ensure secure transit and confirmation of receipt should be obtained. 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 ILG. In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			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.	
1.3	Biometric information (e.g. fingerprints to be used as part of an automated biometric recognition system)	For as long as ILG 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 ILG, where the parent or pupil withdraws consent or the pupil objects to its use	No
1.4	Medical records held by ILG	25 years for pupils aged 18 years, or 24 years for younger pupils	Review for further retention in the case of contentious disputes SHRED / DELETE	No
1.5	Counselling records held by ILG	25 years for pupils aged 18 years, or 24 years for younger pupils	Review for further retention in the case of contentious disputes SHRED / DELETE	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
2	Pupil files			
2.1	Pupil files (including public examination scripts, marks and results)	<p>25 years for pupils aged 18 years, or 24 years for younger pupils</p> <p>Nurseries – Pupil records must be retained for a reasonable period of time after a child has left the care provision (in line with the <i>Statutory framework for the Early Years Foundation Stage</i>).</p> <p>Primary and Secondary – For child protection files see 1.2 above. Other safeguarding records below the Child Protection threshold (low level concerns) should be retained for 1 year post the child leaving or after the last sibling has left.</p>	<p>Review for further retention in the case of contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests</p> <p>SHRED / DELETE</p> <p>Notes:</p> <ul style="list-style-type: none"> • When reviewing pupil files, ILG should have regard to other applicable sections of this policy • Any examination certificates left unclaimed should be returned to the appropriate Examination Board <p>If the child moves school then ILG must retain a copy of the file sent to the new school.</p>	No
2.2	Internal examination scripts, marks and results	<p>Scripts:</p> <p>Scripts from weekly or monthly tests: Keep</p>	<p>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</p>	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		<p>until the end of the next term.</p> <p>Scripts from termly or yearly tests: Keep until the end of the next academic year.</p> <p>Marks and results:</p> <p>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.</p> <p>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.</p>	<p>complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests.</p>	
2.3	Special Educational Needs files, reviews and Individual Education Plans	25 years for pupils aged 18 years, or 24 years for younger pupils	<p>Review for further retention in the case of contentious disputes</p> <p>SHRED / DELETE</p>	No
2.4	Statement of Special Education Needs (SEN) and Education Healthcare (EHC) Plans	<p>25 years for pupils aged 18 years, or 24 years for younger pupils</p> <p>Consider also whether further retention is appropriate in light of IICSA.</p>	<p>SHRED / DELETE unless legal action pending</p> <p>The Statement / Plan belongs to the LA which makes and maintains the Statement / Plan</p>	Yes

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
2.5	Letters authorising absence	Three years from the date of the last entry on the attendance register	SHRED / DELETE	No
2.6	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"> i. one year from the date that ILG ends sponsorship of the Tier 4 student, or ii. if the Tier 4 student is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents 	SHRED / DELETE	No
2.7	Documents that are required to be retained for each enrolled pupil across all ILG sites, encompassing both sponsored and non-sponsored students. The purpose of these documents is to validate the student's identity, including their name, nationality, date of birth, and confirmation of	The retention period for these records extends throughout the student's enrolment. It concludes at the earlier of either: <ul style="list-style-type: none"> • One year from the date the child departs from any of our ILG sites, or • The point at which a Home Office compliance officer has examined and approved the documents to verify the student's identity. 	SHRED / DELETE	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	<p>parental responsibility by the accompanying adult.</p> <p>In the case of a student not having a passport, additional documentation from the guardians with parental responsibility must be retained to confirm the child's nationality and immigration status.</p>			
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 + six 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	For those involved in the incident. 25 years for pupils aged 18 years, or 24 years	Review for further retention in the case of relevance to contentious disputes.	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	incident, accident, injury or near miss involving anyone on the trip	for younger pupils 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	SHRED / DELETE	
4	Admission department and bursarial records			
4.1	Admission and parent contract documents including registration form, letter of offer and acceptance form	Six years from date of leaving	Review for further retention in the case of contentious disputes SHRED / DELETE	No
4.2	Admissions documents relating to applicants who did not join	One year At the setting's discretion. If there is a risk that parents or a pupil might bring a claim against ILG then the documents should be retained	SHRED / DELETE	No
4.3	Financial information in respect of fees	Six years from date of leaving	Review for further retention in the case of contentious disputes SHRED / DELETE	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
4.4	Financial information in respect of trips	Seven years for audit purposes.	Review for further retention in the case of contentious disputes SHRED / DELETE	No
5	Employment			
5.1	Employment or personnel records including recruitment information, contracts of employment, changes to terms and condition, disciplinary matters, grievance procedures.	For at least 10 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 10 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 there are any safeguarding allegations or child protection concerns. Records of safeguarding allegations or child protection concerns (even if not proved) should be retained as follows: Normal retirement, or 10 years from allegation date – whichever is longer. If it is found that allegations are malicious, records should be destroyed immediately.	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	Review whether further retention is necessary. If so, these reasons must be documented. If not SHRED / DELETE	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		<p>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, settings should consider and document why it is necessary to keep it for a particular length of time. Should ILG be notified of a historic abuse claim or should a former member of staff commit offences elsewhere ILG 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.</p>		
5.3	Childcare disqualification declarations	<p>Keep in accordance with guidance from the IICSA. Declarations which contain information in</p>	SHRED / DELETE	Yes

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		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.		
5.4	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
5.5	Employment references received and references provided (where no safeguarding concerns have arisen or are known)	While employment continues and at least up to six years after employment terminates	Consider whether any recent reference requests for the relevant individual have been received. If any concerns are / have been raised by social services or other agencies see 5.6 below. If none, SHRED / DELETE	No
5.6	Employment reference where an individual's employment ended for a safeguarding reason or where safeguarding was outstanding at the time of termination	KCSIE states that these records should be retained for at least 10 years after the person has retired or until the individual reaches the age of 75, whichever is the later. However, whilst IICSA is ongoing no such records should be destroyed. The view of ILG's	Review whether further retention is necessary when IICSA ends. If none, SHRED / DELETE	Yes

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		insurer should also be sought.		
5.7	Working time opt-out forms	Two years from the date on which they were entered into	SHRED / DELETE	Yes
5.8	Records to show compliance with the Working Time Regulations	Two years from the creation of the record	SHRED / DELETE	Yes
5.9	Payroll and wage records These include records of: <ul style="list-style-type: none"> • Details on overtime. • Bonuses. • Expenses. • Benefits in kind. 	Six years from the financial year end in which payments are made	SHRED / DELETE	Yes
5.10	PAYE Records	Three years after the end of the tax year to which they relate (however it may be sensible to keep them for six years as they may fall within the definition of payroll and wage	SHRED / DELETE	Yes

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		records).		
5.11	<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. • Maternity certificates showing the expected week of confinement 	Three years after the end of the tax year in which the maternity pay period ends	SHRED / DELETE	Yes
5.12	Sickness records required for the purposes of Statutory Sick Pay (SSP)	Employers are required to maintain records for PAYE purposes and to show they are meeting their SSP obligations should HMRC require this. Keep in accordance with 5.10 above.	SHRED / DELETE	Yes
5.13	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. Given their potential relevance to pay disputes they should be retained for six	SHRED / DELETE	Yes

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		years after the working relationship ends.		
5.14	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 ILG and the employee. Therefore, ILG 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
5.15	Disclosure and Barring Service (DBS) checks	It is not a requirement to retain the DBS certificate, however Schools can use their discretion to keep these securely on file for the duration of the person's employment. The document should be securely disposed of when the employee leaves	Enter DBS certificate number, date, initials on Single Central Register SHRED / DELETE	Yes
5.16	Immigration checks	Throughout employment and then retained for two years after the termination of employment	SHRED / DELETE	Yes

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.17	Documents that are required to be retained for each worker sponsored by ILG under Tier 2 or Tier 5	Through the period of sponsorship and for whichever is the shorter period of either: <ul style="list-style-type: none"> i. one year from the date that the sponsorship of the Tier 2 or 5 migrant ends, or ii. if the Tier 2 or 5 migrant is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents 	SHRED / DELETE	No
5.18	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
5.19	Personnel and training records	Whilst employment continues and up to six years after employment ceases	SHRED / DELETE	No
5.20	Annual leave records	While employment continues and for six years after employment ends	SHRED / DELETE	No
5.21	Collective / workforce agreements	Whilst employment continues and for six years after employment ceases	SHRED / DELETE	No

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
5.22	Works Council minutes	Permanently	N / A	No
5.23	An employee's bank details	As soon after the end of employment as possible once last payments have been made	SHRED / DELETE	No
5.24	Travel and subsistence claims.	Whilst employment continues and up to six years after employment ends	SHRED / DELETE	
5.25	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
5.26	Death Benefit Nomination and Revocation Forms	Whilst employment continues and up to six years after payment of benefit	SHRED / DELETE	No
6	Health and safety information - employees			
6.1	Reportable injuries, diseases and dangerous occurrences (RIDDOR)	Three years from the date of record If disease - indefinitely (recommended)	Review for further retention in the case of enforcement action or contentious disputes	Yes

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	reports or own record		SHRED / DELETE	
6.2	First aid / accident book entry	Three years from the date of injury or last record in the book If disease - indefinitely	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes
6.3	Records of maintenance, examination and test control measures relating to substances hazardous to health under the Control of Substances Hazardous to Health (COSHH) regime	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes
6.4	Health records for licensable asbestos work	At least 40 years from the date of the last entry	Review for further retention in the case of enforcement action contentious disputes SHRED / DELETE	Yes
6.5	Medical surveillance certificate for 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	Where a health record is required at least 40		Yes

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	for asbestos	years from the date if the last entry 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
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

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
7	Health and safety information - pupils			
7.1	Accident reports including first aid / accident book	22 years for pupils aged 18 years, or 21 years for younger pupils	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 recommend that the record is kept for anyone involved in the incident as follows: 22 years for pupils/staff aged 18 years, or 21 years for younger pupils	Review for further retention in the case of enforcement action or contentious disputes SHRED / DELETE	Yes
7.3	Incident investigations and reports, risk assessments and other relevant documents where there has been an accident or incident	22 years for pupils/staff aged 18 years, or 21 years for younger pupils	Review for further retention in the case of enforcement action or civil claims for personal injury SHRED / DELETE	No
8	Generic health and safety records			
8.1	Risk assessments, records of health and safety arrangements, copies of	These should be kept for as long as they remain relevant - recommend at least three years (in the absence of a specific accident,	Review for further retention in the case of enforcement action or contentious disputes	No

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	<p>policies and procedures</p> <p>General records of health and safety auditing and monitoring including fire risk assessments, electrical testing, PAT testing and gas appliance testing</p> <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>	<p>incident, dangerous occurrence or notifiable disease)</p>	<p>SHRED / DELETE</p>	

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
8.2	Copies of documents, including health and safety files, prepared pursuant to the Construction (Design and Management) Regulations 2015	Records should be retained as long as is reasonably necessary to inform on future construction projects at the setting	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, but recommend the following for anyone involved in the accident or incident: 22 years for pupils/staff aged 18 years, or 21 years for younger pupils 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	Indefinitely	Review once the Inquiry has been completed.	No - unless ILG has received a

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	IICSA			formal notice from IICSA
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>Where the investigation / inquiry / report has been necessitated as a result of a specific incident, 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.</p> <p>For those involved in the accident/incident, recommend as follows:</p> <p>22 years for pupils/staff aged 18 years, or 21 years for younger pupils</p>	SHRED / DELETE	No
11	Records held by ILG for development purposes, including alumni			
11.1	As we have an ongoing relationship with our alumni and others, most information held by the	Until no longer needed.	NA	NA

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	settings or ILG is kept indefinitely.			
11.2	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 considered good practice and may be more straightforward to implement in practice	As set out in section 6 above	As set out in section 6 above	No
11.3	Records of communication preferences (e.g. a record that an individual has asked to unsubscribe from emails).	Will be kept indefinitely, to ensure that individuals are not contacted in a way which contradicts their preferences	N / A	No

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
11.4	Gift aid information	Six years from the end of the tax year in which the claim to HMRC is made.	N / A	No
12	Keeping information for longer			
12.1	Records which do not contain personal data, for example, old photographs of School buildings, title deeds etc	Can be kept indefinitely	N / A	No
12.2	Records kept for reasons of archiving in the public interest. For example, such as old class photographs, lists of pupils attending ILG in any given year, old School prospectuses, newspaper cuttings etc	Will be kept indefinitely.	N / A	No
13	CCTV, videos and photographs			
13.1	CCTV footage	90 days	DELETE Review for further retention if the recording may be required for any reason such as in relation to an	No

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
			<p>incident or accident involving any person.</p> <p>CCTV footage may also be needed in relation to parental complaints, disciplinary matters, pupil exclusions, bullying incidents or health and safety matters.</p> <p>If a subject access request has been made for the footage it must be retained.</p> <p>ILG should consider the relevant limitation periods for claims being brought against ILG and seek advice as necessary.</p>	
13.2	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.	<p>SHRED / DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No
13.3	Photographs or videos of pupils taken for marketing reasons e.g. photographs for use in the prospectus/website, or a video of pupils on the	<p>These photographs and videos should be retained for as long as they are required for the purpose for which they were taken. If the images are retained for archiving reasons</p> <p>If ILG would like to retain the images for archiving reasons please see the comments in</p>	<p>SHRED / DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	website	the introduction.		
13.4	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	<p>These photographs and videos should be retained for as long as they are required for the purpose for which they were taken.</p> <p>If ILG would like to retain the images for archiving reasons please see the comments in the introduction.</p>	<p>SHRED / DELETE</p> <p>Review for further retention in the case of relevance to contentious disputes.</p>	No