

THE BRADFIELD GROUP



Personal Data Retention Policy

Bradfield College and St Andrews Berkshire

Introduction

As part of the data protection transparency requirements of the Data Protection Act 2018, the we are required to give individuals certain information such about how their data is used by us. The reasons and basis for holding personal (and sensitive personal) data are communicated to data subjects in our Privacy Notices.

1. This policy sets out a structured approach to the retention, review and deletion of records across the Group.
2. The retention period for each type of record is shown in the table below. Occasionally there may be special circumstances which mean that a record should be kept for longer (eg most recently IICSA).
3. The periods shown may extend by upto 12 months to reflect disposal cycles.

	Record	Retention period	Action at the end of the retention period (if applicable)
1. Pupil File			
1.1	Pupil File which includes: <ul style="list-style-type: none">• Attendance registers• Pupil reports• Examination results• Performance records• Medical Information including First Aid.• Counselling records held by the College• Special Educational Needs files including individual education plans• Financial information in respect of fees	DOB + 24 Years	Review for further retention in the case of contentious dispute. SHRED/DELETE including back-ups and copies.

1.2	Child Protection/ Safeguarding	Age 75	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 College whilst the child is still under 18. The College must 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 will be copied to the Local Authority (LA)
1.3	Statement of Special Education Needs (SEN) and Education Healthcare (EHC) Plan	DOB+24 years	SHRED/DELETE unless legal action pending. The Statement / Plan belongs to the LA which makes and maintains the Statement / Plan
2. Admissions			
2.1	Admissions <ul style="list-style-type: none"> Admission and parents contact documents including registration form, offer letter and acceptance form Admission documents relating to applicants who did not join the College. 	DOB + 24 Years This will form part of the Pupil's file Bradfield College - Up to 2 years from the date of intended admission St Andrews - Up to 7 years but not exceeding the date the child would have left the school if admitted	SHRED/DELETE
3. Employment records			

3.1	Employment or personnel records including <ul style="list-style-type: none"> Recruitment information Contracts of employment – changes to terms and conditions Disciplinary/ grievance matters Employment references DBS (checked) Immigration checks Training records Leave records 	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. Or 75 Years where there is a safeguarding concern raised.	Six years after the termination date if 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.
3.2	Single Central Register (SCR)	Indefinitely	N/A
3.3	Records and documents relating to membership of and contribution to the Teachers' Pension Scheme.	Indefinitely	N/A
3.4	Payroll records including; <ul style="list-style-type: none"> Details on overtime Bonuses Expenses Benefits in kind SSP Maternity/ Paternity/ Shared Parental leave payments and associated certificates (MATB1) Death benefit Nomination and Revocation forms 	Six years plus current year in which payments are made	SHRED/DELETE
3.5	Employees bank details	Until last payment made	SHRED/DELETE
4. Health & Safety Information			
4.1	Reportable injuries, diseases and dangerous occurrences (RIDDOR) reports or own records.	Six years from the date of termination of employment. If disease – retain indefinitely.	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE
4.2	First Aid/ accident book entry	Six years from the date of termination of employment	SHRED/DELETE
5. Alumni Records			
5.1	General Alumni correspondence, membership forms etc.	Six years after the last time the individual contacted the College.	SHRED/DELETE

6. Historic Archive			
6.1	Records which do not contain personal data, for example, old photographs of the College buildings, title deeds etc.	Can be kept indefinitely	N/A
6.2	Records relating to a number of pupils, or the College generally, such as old class photographs, lists of pupils attending the College in any given year, College prospectuses, newspaper cuttings etc.	Can be kept indefinitely provided the College is satisfied there is a legitimate interest in doing so. Eg: College may have a legitimate interest in building up a picture of the history of College.	N/A
6.3	Records concerning specific pupils kept for a valid reason. For example, a poem written by an exceptionally gifted pupil.	Can be kept indefinitely if the College is satisfied that it has a legitimate interest.	
7. CCTV, videos and photographs			
7.1	CCTV footage	Up to one calendar month	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. If a subject access request has been made for the footage it must be retained.
7.2	Photographs of pupils for internal administration purposes e.g. to identify the pupil or photographs used on security passes.	Delete when pupil leaves	SHRED/DELETE
7.3	Photographs or videos of pupils taken for marketing reasons e.g. photographs for use in the College prospectus or a video of pupils on the College's website	Place in Archive	
7.4	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.	SHRED/DELETE
8.	Enterprises		

8.1	Members of Sports, Golf and Tennis Clubs	Delete all data 6 years after last payment. Delete accident data 6 years after accident	SHRED/DELETE
8.2	Wedding and other Functions	Delete all data 7 years after last payment	SHRED/DELETE

Document Review History

Last review date:
September 2023
Editor: A Bingham & A Culshaw

Next review date:
September 2024