

Information and Records Retention Policy

Inspired Learning Group

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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 Schools and Nurseries are included.
- 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 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 table below 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 issued retention instructions to a range of institutions regarding records relating to the care of children. Although ILG itself has not received such an instruction, in light of this and the wider safeguarding context, ILG has decided to temporarily cease the routine destruction of those records which might be relevant in case they are requested by IICSA or made subject to a disclosure order. This will be kept under review.
- 7 If requested by ILG's insurers, certain categories of documents may be kept for longer time periods. Please note that ILG is keeping this under review and intends to recommence controlled document destruction at the appropriate time.

Secure destruction

- 8 Personal data will be securely deleted or destroyed at the end of the relevant retention period.
- 9 Each setting 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 consultant.
- 10 ILG and each setting will ensure 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, ILG will carry out appropriate due diligence on its contractors to check that they are complying with their obligations and ensure that there is a suitable written agreement 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 as set out in the Employment Manual and/or 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, Family, Netsuite, IRIS and PS People. Details are included on the relevant Personal Data Inventories. Managers 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 (but consider indefinite retention in light of IICSA).	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

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	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)	25 years for pupils aged 18 years, or 24 years for younger pupils	<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 until the end of the next term.</p> <p>Scripts from termly or yearly tests: Keep until</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 complaints, disciplinary matters, pupil exclusions,</p>	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		<p>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>	bullying incidents and subject access requests.	
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
2.5	Letters authorising	Three years from the date of the last entry on	SHRED / DELETE	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	absence	the attendance register		
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
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 incident, accident, injury or	For those involved in the incident. 25 years for pupils aged 18 years, or 24 years for younger pupils	Review for further retention in the case of relevance to 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?
	near miss involving anyone on the trip	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		
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
4.4	Financial information in	Seven years for audit purposes.	Review for further retention in the case of	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	respect of trips		contentious disputes SHRED / DELETE	
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 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	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?
		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.		
5.3	Childcare disqualification declarations	Keep in accordance with guidance from the IICSA. Declarations which contain information in 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.	SHRED / DELETE	Yes
5.4	Records and documents	Indefinitely	Review whether further retention is necessary.	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	relating to membership of and contributions to the Teachers' Pension Scheme		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.	
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	Part 4 of 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 insurer should also be sought.	Review whether further retention is necessary when IICSA ends. If none, SHRED / DELETE	Yes
5.7	Working time opt-out forms	Two years from the date on which they were entered into	SHRED / DELETE	Yes

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
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 records).	SHRED / DELETE	Yes
5.11	Maternity / paternity records These include: <ul style="list-style-type: none"> • Records regarding Maternity payments 	Three years after the end of the tax year in which the maternity pay period ends	SHRED / DELETE	Yes

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	<p>made save for where those include payroll records.</p> <ul style="list-style-type: none"> • Maternity certificates showing the expected week of confinement 			
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 years after the working relationship ends.	SHRED / DELETE	Yes
5.14	Consents for the processing of personal data and sensitive personal data (known as special category personal data under the GDPR)	<p>For as long as the data is being processed and up to six years afterwards</p> <p>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</p>	SHRED / DELETE	Yes

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		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		
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
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 	SHRED / DELETE	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
		Office compliance officer has examined and approved the documents		
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
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	

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
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) 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	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED /	Yes

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	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	control measures relating to substances hazardous to health under the Control of Substances Hazardous to Health (COSHH) regime		DELETE	
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 for asbestos	Where a health record is required at least 40 years from the date of 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	Five years	Review for further retention in the case of enforcement action 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?
	Control of Asbestos Regulations 2012 (CAR)			
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	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)	Minimum statutory retention period is at least 3 years but recommend that the record is kept for anyone involved in the incident as follows:	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	22 years for pupils/staff aged 18 years, or 21 years for younger pupils	SHRED / DELETE	
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 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 instructions or	These should be kept for as long as they remain relevant - 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

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	<p>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>			
8.2	<p>Copies of documents, including health and safety files, prepared pursuant to the Construction (Design and Management) Regulations 2015</p>	<p>Records should be retained as long as is reasonably necessary to inform on future construction projects at the setting</p>	<p>SHRED / DELETE</p>	<p>N / A</p>
9	Insurance			
9.1	<p>Insurance certificates and schedules of cover</p>	<p>Indefinitely</p>	<p>N / A</p>	<p>No</p>

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
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 IICSA	Indefinitely	Review once the Inquiry has been completed.	No - unless ILG 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 Independent Schools Inspectorate, Health and Safety Executive, Local	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. For those involved in the accident/incident,	SHRED / DELETE	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	Authority etc External reports, reviews, investigations and inquiries for example inquests and public inquiries	recommend as follows: 22 years for pupils/staff aged 18 years, or 21 years for younger pupils		
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 settings or ILG is kept indefinitely.	Until no longer needed.	NA	NA
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	As set out in section 6 above	As set out in section 6 above	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	employees do not apply to alumni), treating them the same can be considered good practice and may be more straightforward to implement in practice			
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
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	Will be kept indefinitely.	N / A	No

Appendix 1 – Retention Schedule

	Record	Retention period	Action at the end of the retention period	Retention period required by law?
	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			
13	CCTV, videos and photographs			
13.1	CCTV footage	90 days	<p>DELETE</p> <p>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.</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>	No

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