



# The Abbey

The independent school for girls aged 3-18.

## **Information and Records Retention List:**

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**Independent Day School for Girls**

**The Abbey, Reading**

September 2018

## Introduction

This policy sets out a structured approach to reviewing and destroying records in relation to The Abbey School (the **School**). 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 School 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)).

Data and files will be routinely shredded/securely deleted over the Summer holidays at the end of each academic year, every 12 months, if it does not have to be retrained for a longer period for legal reasons. All pupil files will be bound up and stored in their year groups/year of leaving and held for a 7 year (DOB+24 yrs) period from the end of the academic year that they leave The Abbey, unless otherwise stated in the table below. **For pupils that leave The Abbey to attend another school, their records will be passed over to the new school.** In the UK, archives do not need to be made publically available and all our archived pupil files are stored in a locked access site.

RECORDS/DATA SUBJECT	DELIVERED to..... for SHRED/DELETE/STORAGE	RESPONSIBILITY of..... to get this information together
Sixth Form PUPIL records and data who leave	The Head of Admissions annually (AUGUST)	Sixth Form Administrator
Senior School PUPIL records and data who leave	The Head of Admissions annually (AUGUST)	Senior School Administration Co-ordinator
Junior School PUPIL records and data who leave	The Head of Admissions annually (AUGUST)	PA to the Head of the Junior School
All PUPILS (who move to join another school)	PA to the Head of Junior / Senior School (for passing on to the new school)	Heads of Year/Form
All STAFF records and data who leave	The Head of HR annually (AUGUST)	Senior HR Administrator
All ADMISSIONS records and data	The Head of Admissions annually (AUGUST)	Admissions Officers
All FINANCE records and data	The Head of Finance and Resources annually (AUGUST)	PA to the Head of Finance and Resources
All ALUMNAE records and data	The Head of External Relations annually (AUGUST)	Engagement Officer

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All SAFETY/MAINTENANCE records and data	The Head of Maintenance/Domestic Services (AUGUST)	Maintenance Managers/ Nurses
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	Records/Data	Retention period	Action at the end of the retention period	Retention period required by law?	Designated Lead (who carries responsibility for <u>storing</u> this data)	Admin. Lead (who carries responsibility for <u>collecting</u> this data)
<b>1</b>	<b>Pupils</b>					
1.1	Admission registers (however held)	DOB of the pupil + 24 years	Review for further retention in the case of contentious dispute SHRED/DELETE	<b>Yes</b>	Head of Admissions	Admissions Officer
1.2	Attendance registers (however held)	DOB of the pupil + 24 years	Review for further retention in the case of contentious dispute SHRED/DELETE	<b>Yes</b>	Data Manager	PA to Head SS PA to Head JS
1.3	Child protection records	DOB of the pupil + 24 years	Review for further retention in the case of contentious dispute SHRED/DELETE <b>Notes</b> 1 Child protection information sent under separate cover to the new school whilst the child is still under 18.	No	Head of SS Head of JS	PA to Head SS PA to Head JS

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			<p>2 Where a child is removed from roll to be educated at home, the file should be sent to the Local Authority (LA)</p> <p>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.</p>			
1.4	Medical records held by the School	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes SHRED/DELETE	No	School Nurse for the Senior School	PA to Head SS PA to Head JS
1.5	Counselling records held by the School	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes SHRED/DELETE	No	Head of SS Head of JS	PA to Head SS PA to Head JS
<b>2</b>	<b>Pupil files</b>					
2.1	Pupil files (including public examination scripts, marks & results)	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests	No	Head of Year	PA to Head SS PA to Head JS

			SHRED/DELETE			
2.2	Internal examination scripts, marks & results	Scripts, marks & results to be kept for no longer than the relevant Key Stage or examination phase.	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.  SHRED/DELETE	No	Heads of Department	PA to Head SS PA to Head JS
2.3	Special Educational Needs files, reviews and Individual Education Plans	DOB of the pupil + 24 years	Review for further retention in the case of contentious disputes  SHRED/DELETE	No	Deputy Head Academic in Senior School  Head of Year	PA to Head SS PA to Head JS
2.4	Statement of Special Education Needs ( <b>SEN</b> ) and Education Health Care ( <b>EHC</b> ) Plans	Statements of SEN (including appendices) and EHC Plans should never be retained once the pupil has left the School	SHRED/DELETE - unless legal action pending  The Statement / Plan belongs to the LA which makes and maintains the Statement / Plan  <b>Notes</b>  1. Key pupil information is passed onto the new school when the pupil leaves	<b>Yes</b>	Deputy Head Academic in Senior School  Head of Year	PA to Head SS PA to Head JS
2.5	Letters authorising absence	DOB of the pupil + 24 years	SHRED/DELETE	No	Head of SS Head of JS	PA to Head SS PA to Head JS
2.6	Documents that are required to be retained for each migrant enrolled	DOB of the pupil + 24 years	SHRED/DELETE	No	Head of Admissions	Head's PA PA to Head JS

	under Tier 4 (General) Student or Tier 4 (Child) Student visas					
<b>3</b>	<b>Permissions</b>					
	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	Review for further retention in the case of contentious disputes otherwise SHRED/DELETE	No	Head of Year	Senior School Admin. Co-ordinator (SS) PA to Head JS
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	Up to one year on annual cycle for general trips where no incidents have been reported.  DOB of the pupil involved in major incident + 24 years	Review for further retention in the case of relevance to contentious disputes. SHRED/DELETE	No	Head of SS Head of JS	PA to Head SS PA to Head JS
<b>4</b>	<b>Admission department and bursarial records</b>					
	Admission and parent contract documents including registration form,	Seven years from date of leaving the School	Review for further retention in the case of contentious disputes SHRED/DELETE	No	Head of Admissions	Admissions Officer

	letter of offer and acceptance form					
4.2	Admissions documents relating to applicants who did not join the School	Up to one year on annual cycle.	SHRED/DELETE	No	Head of Admissions	Admissions Officer
4.3	Financial information in respect of fees	Seven years from date of leaving the School	Review for further retention in the case of contentious disputes SHRED/DELETE	No	Head of Finance and Resources	PA to Head of Finance and Resources
<b>5</b>	<b>Employment</b>					
	Employment or personnel records including recruitment information, contracts of employment, changes to terms and condition, disciplinary matters, grievance procedures.	Seven years after date of termination of employment	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. SHRED/DELETE <b>Notes</b> 1. Records of anyone with child protection concerns (even if not proved) should be retained	No	Head of HR	Senior HR Admin.
5.2	Single central register (SCR)	Monthly versions/ updates are kept electronically for 6 months and then deleted in the annual cycle.	Review whether further retention is necessary. If so, these reasons must be documented. If not SHRED/DELETE <b>Notes</b>	No	Head of HR	Senior HR Admin.

			1. There is no legal requirement to keep the SCR entry for staff who have left as it ceases to be relevant for inspection purposes.			
5.3	Records and documents relating to membership of and contributions to the Teachers' Pension Scheme	Seven years after date of termination of employment	Review whether further retention is necessary. SHRED/DELETE	No	Head of Finance and Resources	PA to Head of Finance and Resources
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  All records are stored electronically	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	Head of HR	Senior HR Admin.
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	Head of HR	Senior HR Admin.
5.6	Working time opt out forms	Seven years after date of termination of employment.	SHRED/DELETE	Yes	Head of HR	Senior HR Admin.



		Min/Max working hours - 40 hrs/week Sign a disclaimer if work more hrs.				
5.7	Records to show compliance with the Working Time Regulations	Seven years after date of termination of employment  Min/Max working hours - 40 hrs/week  Sign a disclaimer if work more hrs.	SHRED/DELETE	<b>Yes</b>	Head of HR	Senior HR Admin.
5.8	Payroll and wage records  These include records of:  <input type="checkbox"/> Details on overtime <input type="checkbox"/> Bonuses <input type="checkbox"/> Expenses <input type="checkbox"/> Benefits in kind	Seven years after date of termination of employment	SHRED/DELETE	<b>Yes</b>	Head of HR/ Head of Finance and Resources	Senior HR Admin.
5.9	PAYE Records	Seven years after date of termination of employment.	SHRED/DELETE	<b>Yes</b>	Head of HR/ Head of Finance and Resources	Senior HR Admin.

5.10	<p>Maternity/ Paternity records</p> <p>These include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Records regarding Maternity payments made save for where those include payroll records.</li> <li><input type="checkbox"/> Maternity certificates showing the expected week of confinement</li> </ul>	Seven years after date of termination of employment.	SHRED/DELETE	<b>Yes</b>	Head of HR	Senior HR Admin.
5.11	Sickness records required for the purposes of Statutory Sick Pay ( <b>SSP</b> )	Seven years after date of termination of employment	<p>SHRED/DELETE</p> <p><b>Notes</b></p> <p>1. Separate from absence records which merely demonstrate the dates absent and not the health issue.</p>	<b>Yes</b>	Head of HR	Senior HR Admin.
5.12	Records in relation to hours worked and payments made to workers	Seven years after date of termination of employment	SHRED/DELETE	<b>Yes</b>	Head of HR	Senior HR Admin.

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5.13	Consents for the processing of personal data and sensitive personal data	Seven years after date of termination of employment	SHRED/DELETE  <b>Notes</b>  1. In the vast majority of cases it is not necessary to obtain the employee's consent before using their personal data.	Yes	Head of HR	Senior HR Admin.
5.14	Disclosure and Barring Service (DBS) checks and disclosures of criminal record forms	Dispose of securely after the recruitment process unless assessed as relevant to ongoing employment relationship.	Enter DBS certificate number, date, initials on Single Central Register  SHRED/DELETE  <b>Notes</b>  1. Once the conviction is spent, should be deleted unless it is an excluded profession. 2. Look at originals - do not accept photocopied or scanned documents.	Yes	Head of HR	Senior HR Admin.
5.15	Immigration checks	Seven years after date of termination of employment	SHRED/DELETE	Yes	Head of HR/ Head of Admissions	Senior HR Admin.
5.16	Recruitment records of unsuccessful candidates	Up to six months after notifying unsuccessful candidates - as part of the annual cycle	SHRED/DELETE	No	Head of HR	Senior HR Admin.
5.17	Personnel and training records	Seven years after date of termination of employment	SHRED/DELETE	No	Head of HR	Senior HR Admin.

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5.18	Annual leave records	Seven years after date of termination of employment	SHRED/DELETE <b>Notes</b> 1. Leave cannot be carried over	No	Head of HR	Senior HR Admin.
5.19	Collective/ workforce agreements	Seven years after date of termination of employment	SHRED/DELETE	No	Head of HR	Senior HR Admin.
5.20	An Employee's bank details	Up to one year on annual cycle	SHRED/DELETE	No	Head of HR/ Head of Finance and Resources	Senior HR Admin.
<b>6</b>	<b>Health and safety information - employees</b>					
	Reportable injuries, diseases and dangerous occurrences ( <b>RIDDOR</b> ) reports or own record	Seven years after date of termination of employment	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	<b>Yes</b>	Domestic Services Manager / Nurse	Maintenance Manager
6.2	First aid / accident book entry	Seven years after date of termination of employment	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	<b>Yes</b>	Domestic Services Manager/ Nurse	Maintenance Manager
6.3	Records of maintenance, examination and test control measures	Seven years after date of termination of employment	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	<b>Yes</b>	Head of Maintenance	Maintenance Manager

	relating to substances hazardous to health under the Control of Substances Hazardous to Health (COSHH) regime					
6.4	Health records for licensable asbestos work	50 years from the date of the last entry	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes	Head of Maintenance	Maintenance Manager
6.5	Medical surveillance certificate for licensable asbestos work	Seven years from the date it was issued	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes	Head of Maintenance	Maintenance Manager
6.6	Records of air monitoring for asbestos	Seven years from the date of the last entry	SHRED/DELETE	Yes	Head of Maintenance	Maintenance Manager
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)	Seven years	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes	Head of Maintenance	Maintenance Manager

6.8	Examination/ report of defect for power presses	Seven years	Review for further retention in the case of enforcement action or contentious disputes  SHRED/DELETE	Yes	Head of Maintenance	Maintenance Manager
6.9	Records of water monitoring, inspection, testing, checks and control measures for legionellosis	Seven years from the date of the last entry	Review for further retention in the case of enforcement action or contentious disputes  SHRED/DELETE	Yes	Head of Maintenance	Maintenance Manager
<b>7</b>	<b>Health and safety information - pupils</b>					
	Accident reports including first aid/ accident book	Up to one year on annual cycle	Review for further retention in the case of enforcement action or contentious disputes  SHRED/DELETE	No	Head of Year /Nurse	PA to Head SS  PA to Head JS
7.2	Reportable injuries, diseases and dangerous occurrences <b>(RIDDOR)</b> reports or own record	DOB of the pupil involved in the incident + 24 years	Review for further retention in the case of enforcement action or contentious disputes  SHRED/DELETE	Yes	Head of Year /Nurse	PA to Head SS  PA to Head JS
7.3	Incident investigations and reports, risk	DOB of the pupil involved in the	Review for further retention in the case of enforcement action or civil claims for personal injury	No	Head of Year /Nurse	PA to Head SS

	assessments and other relevant documents where there has been an accident or incident	incident + 24 years	SHRED/DELETE			PA to Head JS
<b>8</b>	<b>Generic health and safety records</b>					
	<p>Risk assessments, records of health and safety arrangements, copies of 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>	Up to one year on annual cycle	<p>Review for further retention in the case of enforcement action or contentious disputes</p> <p>SHRED/DELETE</p>	No	Head of Year /Head of Maintenance	<p>PA to Head SS</p> <p>PA to Head JS</p>

	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	Up to one year on annual cycle	SHRED/DELETE	N/A	Head of Estates	Head of Estates
<b>9</b>	<b>Insurance</b>					
	Insurance certificates and schedules of cover	Employers Liability Insurance Certificates are kept, by Insurers, by law, as part of the ELTO system.	N/A	No	Head of Finance and Resources	PA to Head of Finance and Resources
9.2	Correspondence with insurers related to specific accidents or incidents	Up to one year on annual cycle 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	Head of Finance and Resources	PA to Head of Finance and Resources



<b>10</b>	<b>Investigations, reviews and inquiries</b>						
	Documents relevant to IICSA	Hand over to IICSA, as appropriate  Up to one year on annual cycle once inquiry has been completed	Review once the Inquiry has been completed.	No	Head of SS Head of JS	PA to Head SS PA to Head JS	
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 Authority, Charity Commission etc  External reports, reviews, investigations and inquiries for example inquests and public inquiries	DOB of the pupil involved in the incident + 24 years	SHRED/DELETE	No	Head of SS Head of JS	PA to Head SS PA to Head JS	
<b>11</b>	<b>Alumnae records</b>						

	General alumnae correspondence, membership forms, etc	Indefinitely, as appropriate	SHRED/DELETE	No	Head of External Relations	Engagement Officer
11.2	Records of communication preferences (e.g. a record that an individual has asked not to unsubscribe from emails)	Indefinitely, as appropriate	SHRED/DELETE	No	Head of External Relations	Engagement Officer
<b>12</b>	<b>Keeping information for longer</b>					
	Records which do not contain personal data, for example, photographs of School buildings, title deeds, etc	Indefinitely, as appropriate	SHRED/DELETE	No	Head of External Relations	Engagement Officer/ Senior Manager Marketing
12.2	Records kept for reasons of archiving in the public interest. For example, such as old class photographs, lists of pupils attending the School in any given year, old School prospectuses, newspaper cuttings	Indefinitely, as appropriate	SHRED/DELETE	No	Head of External Relations	Engagement Officer/ Senior Manager Marketing

	Old Council minutes, etc					
<b>13</b>	<b>CCTV, videos and photographs</b>					
	CCTV footage	Less than 7 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.  CCTV footage may also be needed in relation to parental complaints, disciplinary matters, pupil exclusions, bullying incidents or health and safety matters.	No	Head of Maintenance	Maintenance Manager
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	Head of External Relations	Senior Manager Marketing
13.3	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.	SHRED/DELETE Review for further retention in the case of relevance to contentious disputes.	No	Head of External Relations	Senior Manager Marketing

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.	SHRED/DELETE  Review for further retention in the case of relevance to contentious disputes.	No	Head of Department	The staff responsible for collecting the footage/ images/data
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