Information and Records Retention List

The Abbey School, Reading

Reviewed by:	Head of Finance and Resources Head of IT	April 2025
Ratified by:	Whole School Leadership Committee and Governor Audit	April 2025
Next review: April 2027		

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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 student files will be bound 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 students that leave The Abbey to attend another school, their records will be forwarded to the new school.** In the UK, archives do not need to be made publicly available and all our archived student 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 STUDENT records and data who leave	Head of Marketing and Admissions annually (AUGUST)	Sixth Form Administrator
Senior School STUDENT records and data who leave	Head of Marketing and Admissions annually (AUGUST)	Senior School Administration Co-ordinator
Junior School STUDENT records and data who leave	Head of Marketing and Admissions annually (AUGUST)	PA to the Head of the Junior School
All STUDENTS (who move to join another school)	PA to the Head of Junior / Senior School (for forwarding to the new school)	Directors of Lower/Upper School
All STAFF records and data who leave	Director of HR and Compliance annually (AUGUST)	HR Advisor/HR and Compliance Officer

All ADMISSIONS records and data	Head of Marketing and Admissions annually (AUGUST)	Marketing and Admissions Officers
All FINANCE records and data	Head of Finance and Resources annually (AUGUST)	PA to the Head of Finance and Resources
All ALUMNAE records and data	Head of Development and Engagement annually (AUGUST)	Engagement and Development Officer

All SAFETY/MAINTENANCE records and data	Head of Estates/Domestic Services (AUGUST)	Estates Managers / Nurses

	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)
1	**Students**					
1.1	Admission registers (however held)	DOB of the student + 24 years	Review for further retention in the case of contentious dispute SHRED/DELETE	**Yes**	Head of Marketing and Admissions	Admissions Officer
1.2	Attendance registers (however held)	DOB of the student + 24 years	Review for further retention in the case of contentious dispute SHRED/DELETE	**Yes**	Data Manager	PA to Head SS PA to Head JS

1.3	Child protection records	DOB of the student + 24 years	Review for further retention in the case of contentious dispute SHRED/DELETE **Notes** 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
			2 Where a child is removed from roll to be educated at home, the file should be sent to the Local Authority (**LA**) 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.			
1.4	Medical records held by the School	DOB of the student + 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 student + 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
2	**Student files**					
2.1	Student files (including public examination scripts, marks & results)	DOB of the student + 24 years	Review for further retention in the case of contentious disputes, for example, parental complaints, disciplinary matters, student exclusions, bullying incidents and subject access requests	No	Directors of Lower/Upper School	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, student 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 student + 24 years	Review for further retention in the case of contentious disputes SHRED/DELETE	No	Deputy Head Assistant Directors of Lower/Upper School	PA to Head SS PA to Head JS

2.4	Statement of Special Education Needs (**SEN**) and Education Health Care (**EHCP**) Plans	Statements of SEN (including appendices) and EHC Plans should never be retained once the student has left the School	SHRED/DELETE - unless legal action pending The Statement / Plan belongs to the LA which makes and maintains the Statement / Plan **Notes** 1. Key student information is passed onto the new school when the student leaves	**Yes**	Deputy Head Assistant Directors of Lower/Upper School	PA to Head SS PA to Head JS
2.5	Letters authorising absence	DOB of the student + 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 under Tier 4 (General) Student or Tier 4 (Child) Student visas	DOB of the student + 24 years	SHRED/DELETE	No	Head of Marketing and Admissions	Head's PA PA to Head JS

3	**Permissions**					
	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	Assistant Directors of Lower/Upper School	Senior School Admin (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 student 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
4	**Admission department and bursarial records**					
4.1	Admission and parent contract documents including registration form, letter of offer and acceptance form	Seven years from date of leaving the School	Review for further retention in the case of contentious disputes SHRED/DELETE	No	Head of Marketing and Admissions	Marketing and Admissions Officer

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 Marketing and Admissions	Marketing and 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
5	**Employment**					
	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 **Notes** 1. Records of anyone with child protection concerns (even if not proved) should be retained	No	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer
5.2	Single central register (SCR)	A live document is maintained and updated regularly. .	Review whether further retention is necessary. If so, these reasons must be documented. If not SHRED/DELETE **Notes**	No	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer

			There is no legal requirement to keep the SCR entry for staff who have left as it ceases to be relevant for inspection purposes however it is beneficial as a record of employment for those staff who have left the employment of the School and employment references are required.			
5.3	Records and documents relating to membership of and contributions to Pension Schemes	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	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer
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**	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer.

5.6	Payroll and wage records These include records of: ❏ Details on overtime ❏ Bonuses ❏ Expenses ❏ Benefits in kind	Seven years after date of termination of employment	SHRED/DELETE	**Yes**	Director of HR and Compliance /Head of Finance and Resources	HR Advisor/ HR and Compliance Officer
5.7	PAYE Records	Seven years after date of termination of employment.	SHRED/DELETE	**Yes**	Director of HR and Compliance /Head of Finance and Resources	HR Advisor/ HR and Compliance Officer

5.8	Maternity/ ShPL/Paternity records These include: ❏ Records regarding Maternity payments made save for where those include payroll records. ❏ Maternity certificates showing the expected week of confinement	Seven years after date of termination of employment.	SHRED/DELETE	**Yes**	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer
5.9	ICO Workers Health Guidance 2023 - sickness absence records, injury reports and, information about disabilities and other medical information to include Occupational Health and health questionnaires–	Seven years after date of termination of employment.	SHRED/DELETE	**Yes**	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer

5.10	Sickness records required for the purposes of Statutory Sick Pay (**SSP**)	Seven years after date of termination of employment	SHRED/DELETE **Notes** Separate from absence records which merely demonstrate the dates absent and not the health issue.	**Yes**	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer.
5.11	Records in relation to hours worked and payments made to workers	Seven years after date of termination of employment	SHRED/DELETE	**Yes**	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer.
5.12	Consents for the processing of personal data and sensitive personal data	Seven years after date of termination of employment	SHRED/DELETE **Notes** In the vast majority of cases it is not necessary to obtain the employee's consent before using their personal data.	**Yes**	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer
5.13	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 **Notes** Once the conviction is spent, should be deleted unless it is an excluded profession.	**Yes**	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer
5.14	Immigration checks – employees and students	Seven years after date of termination of employment	SHRED/DELETE	**Yes**	Director of HR and Compliance / Head of Marketing	HR Advisor/ HR and Compliance

					and Admissions	Officer
5.15	Recruitment records of unsuccessful candidates	Up to six months after notifying unsuccessful candidates	SHRED/DELETE	No	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer
5.16	Personnel and training records	Seven years after date of termination of employment	SHRED/DELETE	No	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer.
5.17	Annual leave records	Seven years after date of termination of employment	SHRED/DELETE **Notes** Leave cannot be carried over	No	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer
5.18	Collective/ workforce agreements	Seven years after date of termination of employment	SHRED/DELETE	No	Director of HR and Compliance	HR Advisor/ HR and Compliance Officer

5.19	Employee's bank details	Up to one year on annual cycle	SHRED/DELETE	No	Director of HR and Compliance / Head of Finance and Resources	HR Advisor/ HR and Compliance Officer
6	**Health and safety information - employees**					
6.1	Reportable injuries, diseases and dangerous occurrences (**RIDDOR**) 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	**Yes**	Domestic Services Manager / Nurse	Domestic Services Manager / Nurse
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	**Yes**	Domestic Services Manager / Nurse	Domestic Services Manager / Nurse
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	**Yes**	Head of Estates	Estates 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 Estates	Estates 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 Estates	Estates Manager
6.6	Records of air monitoring for asbestos	Seven years from the date of the last entry	SHRED/DELETE	**Yes**	Head of Estates	Estates 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 Estates	Estates 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 Estates	Estates 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 Estates	Estates Manager
7	**Health and safety information - students**					
7.1	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	Assistant Directors of Lower/Upper School /Nurse	PA to Head SS PA to Head JS

7.2	Reportable injuries, diseases and dangerous occurrences (**RIDDOR**) reports or own record	DOB of the student involved in the incident + 24 years	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	**Yes**	Assistant Directors of Lower/Upper /Nurse	PA to Head SS PA to Head JS
7.3	Incident investigations and reports, risk assessments and other relevant documents where there have been an accident or incident	DOB of the student involved in the incident + 24 years	Review for further retention in the case of enforcement action or civil claims for personal injury SHRED/DELETE	No	Assistant Directors of Lower/Upper /Nurse	PA to Head SS PA to Head JS

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 information Maintenance logs and / or records of plant and / or equipment plus safety manuals / notices / instructions	Up to one year on annual cycle	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	No	Assistant Directors of Lower/Upper /Head of Estates	PA to Head SS PA to Head JS

	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	Estates Manager
9	**Insurance**					
9.1	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

10	**Investigations, reviews and inquiries**					
10.1	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 student involved in the incident + 24 years	SHRED/DELETE	No	Head of SS Head of JS	PA to Head SS PA to Head JS

11	**Alumnae records**					
11.1	General alumnae correspondence, membership forms, etc	Indefinitely, as appropriate	SHRED/DELETE	No	Head of Development and Engagement	Engagement and Development 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 Development and Engagement	Engagement and Development Officer
12	**Keeping information for longer**					
12.1	Records which do not contain personal data, for example, photographs of School buildings, title deeds, etc	Indefinitely, as appropriate	SHRED/DELETE	No	Head of Development and Engagement	Engagement and Development Officer / Marketing and Admissions Officer

12.2	Records kept for reasons of archiving in the public interest. For example, such as old class photographs, lists of students attending the School in any given year, old School prospectuses, newspaper cuttings Old Council minutes, etc	Indefinitely, as appropriate	SHRED/DELETE	No	Head of Development and Engagement	Engagement and Development Officer / Marketing and Admissions Officer
13	**CCTV, videos and photographs**					
13.1	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, student exclusions, bullying incidents or health and safety matters.	No	Head of Estates	Estates Manager
13.2	Photographs of students for internal administration purposes e.g. to identify the student 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 Marketing and Admissions	Marketing and Admissions Officer

13.3	Photographs or videos of students taken for marketing reasons e.g. photographs for use in the School prospectus or a video of students 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 Marketing and Admissions	Marketing and Admissions Officer
13.4	Photographs or videos of students 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	Assistant Directors of Lower/Upper	The staff responsible for collecting the footage/ images/data