

Data Retention Policy

This policy applies to all pupils and staff of Abbot's Hill, including EYFS.

1. GDPR and document retention

- 1.1 The General Data Protection Regulation (GDPR) from 25 May 2018 does not fundamentally change the principles for length of document retention – it is still a question of relevance and purpose, as well as data security.
- 1.2 At Abbot's Hill, we take data protection seriously (see separate Data Protection Policy) and this policy sets out the document retention periods which the school adheres to.

2. IICSA, child protection and document retention

- 2.1 In the light of the Independent Inquiry into Child Sexual Abuse (IICSA), independent schools have been strongly advised not to delete historic staff and pupil files unless no living person is around to bring a possible claim.
- 2.2 For the moment, therefore, staff files are being kept indefinitely since safeguarding takes precedence over the retention periods set out below which are otherwise the school's default setting for deleting data. Pupil files are dealt with as overleaf.
- 2.3 In due course we expect more settled guidance from the relevant authorities and this policy will be updated accordingly at that point.
- 2.4 In the meanwhile, all records are kept secure, accessible only by trained staff on a need-to-know basis.

3. Secure disposal of documents

- 3.1 Confidential, sensitive or personal information is securely disposed of and either shredded by appropriate staff on site or sealed in secure bags and shredded by a confidential shredding company.
- 3.2 The following table is referred to when considering whether to retain or dispose of data:

Signed

Issue Date: May 2018

Review Date: May 2021 or earlier if major change



Mrs Kathryn Gorman
Head

Table of retention periods

Type of Record/Document	Abbot's Hill Retention Period
<p><u>SCHOOL-SPECIFIC RECORDS</u></p> <ul style="list-style-type: none"> Registration documents of School Attendance Register Minutes of Governors' meetings Annual tracking and assessment 	<p>Permanent (or until closure of the school)</p> <p>Minimum 3 years from last date of entry.</p> <p>Minimum – 10 years from date of meeting (see corporate records below)</p> <p>Minimum – until the pupil is aged 25 years old.</p>
<p><u>INDIVIDUAL PUPIL RECORDS</u></p> <ul style="list-style-type: none"> Admissions: application forms, assessments, records of decisions Examination results (external or internal) Pupil file including: <ul style="list-style-type: none"> o Pupil reports o Pupil performance records o Pupil medical records Special educational needs records (<i>to be risk assessed individually</i>) 	<p>Maximum - 25 years from date of birth</p> <p>Maximum - 25 years from date of birth</p> <p>ALL: 25 years from date of birth (subject to safeguarding considerations described above) unless already passed onto another school.</p> <p>Date of birth plus up to 25 years (allowing for special extensions to statutory limitation period)</p>
<p><u>SAFEGUARDING</u></p> <ul style="list-style-type: none"> Policies and procedures DBS disclosure certificates (if held) Incident reporting Child Protection files 	<p>Keep a permanent record of historic policies</p> <p><i>See Employee/Personnel Records below.</i></p> <p>Keep on record for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse). Ideally, files to be reviewed from time to time if resources allow and a suitably qualified person is available.</p> <p>Safeguarding files are securely passed onto the pupil's next school. If the next school is unknown, files are kept until the child reaches 25 years' old (except for sexual abuse where the file is kept indefinitely).</p>



<ul style="list-style-type: none"> • Biometrics (Nursery) 	<p>If a referral has been made / children services has been involved or a child has been subject of a multi-agency plan – indefinitely.</p> <p>If low level concerns, with no multi-agency act – apply applicable school low-level concerns policy rationale (this may be 25 years from date of birth OR indefinitely)</p> <p>Biometric details on file are deleted for parents as soon as their child leaves the Nursery. For staff, details are deleted when the staff leaves the school's employment or they no longer need access to the Nursery.</p>
<p><u>CORPORATE RECORDS (where applicable)</u></p> <ul style="list-style-type: none"> • Certificates of Incorporation • Minutes, Notes and Resolutions of Boards or Management Meetings • Shareholder resolutions • Register of Members/Shareholders • Annual reports 	<p>Permanent (or until dissolution of the company)</p> <p>Minimum – 10 years</p> <p>Minimum – 10 years</p> <p>Permanent (minimum 10 years for ex-members / shareholders)</p> <p>Minimum – 6 years</p>
<p><u>ACCOUNTING RECORDS</u></p> <ul style="list-style-type: none"> • Accounting records including Tax returns • Budget and internal financial reports 	<p>Minimum – 6 years from the end of the financial year in which the transaction took place</p> <p>Minimum – 3 years</p>
<p><u>CONTRACTS AND AGREEMENTS</u></p> <ul style="list-style-type: none"> • Signed or final/concluded agreements (<i>plus any signed or final/concluded variations or amendments</i>) • Deeds (or contracts under seal) 	<p>Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later</p> <p>Minimum – 13 years from completion of contractual obligation or term of agreement</p>



<p><u>INTELLECTUAL PROPERTY RECORDS</u></p> <ul style="list-style-type: none"> Formal documents of title (trade mark or registered design certificates; patent or utility model certificates) Assignments of intellectual property to or from the school <p>IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents)</p>	<p>Permanent (in the case of any right which can be permanently extended, e.g. trade marks); otherwise expiry of right plus minimum of 7 years.</p> <p>As above in relation to contracts (7 years) or, where applicable, deeds (13 years).</p> <p>Minimum – 7 years from completion of contractual obligation concerned or term of agreement</p>
<p><u>EMPLOYEE / PERSONNEL RECORDS</u></p> <ul style="list-style-type: none"> Single Central Record of employees Contracts of employment DBS Disclosure Certificates Employee appraisals or reviews Staff personnel file Payroll, salary, maternity pay records Pension or other benefit schedule records Job application and interview/rejection records (unsuccessful applicants) Immigration records Health records relating to 	<p>Keep a permanent record of all mandatory checks that have been undertaken (but <u>not</u> DBS certificate itself: 6 months as above)</p> <p>Minimum - 7 years from end of contract</p> <p><u>No longer than 6 months</u> from decision on recruitment, unless DBS specifically consulted – but a record of the checks being made must be kept, if not the certificate itself.</p> <p>Duration of employment plus minimum of 7 years</p> <p>Minimum – 7 years (subject to safeguarding considerations as described above)</p> <p>Minimum – 6 years</p> <p>Possibly permanent, depending on nature of scheme</p> <p>Minimum 3 months but no more than 1 year</p> <p>Minimum – 4 years</p> <p>7 years from end of contract of employment</p>



employees	
<p><u>INSURANCE RECORDS</u></p> <ul style="list-style-type: none"> Insurance policies (will vary – private, public, professional indemnity) Correspondence related to claims/ renewals/ notification re: insurance 	<p>Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim.</p> <p>Minimum – 7 years</p>
<p><u>ENVIRONMENTAL, HEALTH & DATA</u></p> <ul style="list-style-type: none"> Maintenance logs Major Accidents to children (referred to emergency services or RIDDOR report) Accident at work records (staff) Staff use of hazardous substances Risk assessments (carried out in respect of above) Data protection records documenting processing activity, data breaches 	<p>10 years from date of last entry</p> <p>25 years from birth</p> <p>Minimum – 4 years from date of accident, but review case-by-case where possible</p> <p>Minimum – 7 years from end of date of use</p> <p>7 years from completion of relevant project, incident, event or activity.</p> <p>No limit: as long as up-to-date and relevant (as long as no personal data held)</p>