

# Records Retention and Disposal Schedule

Apollo Partnership Trust as Data Controller and its schools are committed to maintaining the confidentiality of its information and ensuring that all records within its schools are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (GDPR) and our schools also have a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purposes(s) for which they were intended.

This schedule is an appendix to the Trust’s Data Protection Policy and contains recommended retention periods for the records created and maintained by each school within Success Academy Trust drawing upon statutory and other guidance including DfE’s Data Protection: A Toolkit for Schools – Annex 5. Each of our schools may add additional lines to this schedule or grey out a field which is not applicable to their local arrangements in order to more clearly reflect those local arrangements. However, schools within the Trust will not delete any line or change the associated record number.

The schedule refers to all information regardless of the media in which it is stored. Some of the retention periods are governed by statute. Others are guidelines following best practice. Every effort has been made to ensure that these retention periods are compliant with the requirement of the Data Protection Act 1998, the Freedom of Information Act 2000 and the General Data Protection Regulations 2018.

	Basic file description	Data Protection Issues	Justification	Legal basis for Lawful Processing	Retention period	Action at the end of the administrative life of the record
<b>1. Safeguarding</b>						
1.1	Child protection files (primary school)	Yes	Keeping Children Safe in Education (DfE)	Legal Obligation	Retain for the duration of the pupil’s attendance at the school and then transfer to Secondary school. Where child is removed from the roll to be educated at home/missing from education below.	Transfer to Secondary school securely
1.2	Child protection files (secondary schools)	Yes	Safeguarding Children in Education Keeping Children Safe in Education	Legal Obligation	Retain for 25 years Where a child is removed from roll to be educated at home/missing from education see below	Check current legislation around CP records and if appropriate secure disposal
1.3	Child protection files (child missing from education, Traveller, Roma, or Gypsy and therefore removed from roll)	Yes	Safeguarding Children in Education Keeping Children Safe in Education	Legal Obligation	Permanent	n/a

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1.4	Child protection files (Child is removed from the roll and is Elective Home Educated)	Yes	Safeguarding Children in Education Keeping Children Safe in Education	Legal Obligation	Permanent	n/a
1.5	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance (information Commissioner's Office)	Legal Obligation	Retain until the person's normal retirement age or 10 years from date of the allegation (whichever is the longer)	Check current legislation around CP records and if appropriate secure disposal
<b>2. Governors</b>						
2.1	Principal set (agenda, minutes, reports)		Inspection copies Historical record (Note this is not statutory but advisory common practice)	Public Interest	Permanent Keep paper inspection copies for 6 years after end of academic year relate to and transfer to electronic archive record.	n/a
2.2	Articles of Association	No	Retain whilst operationally required	Legal Obligation	Permanent	n/a
2.3	Trusts and Endowments	No	Retain whilst operationally required	Legal Obligation	Permanent (currently n/a)	n/a
2.4	Policy documents	No	Retain whilst operationally required	Legal Obligation / Legitimate Interest (policy dependent)	Permanent (archived electronically)	n/a
2.5	Complaints files	Yes	Common practice	Legitimate Interest	Date of resolution plus 7 years	Review and destroy if complaints are non-contentious
2.6	Annual Reports to Companies House	Yes	Company law requirement	Legal Obligation	Date of report plus 7 years (copies transferred to Company House)	Secure disposal
<b>3. Management</b>						
3.1	Minutes of Management Team	Yes	Common practice	Legitimate Interest	Current academic year plus 6 years	Secure disposal

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	Basic file description	Data Protection Issues	Justification	Legal basis for Lawful Processing	Retention period	Action at the end of the administrative life of the record
3.2	Records created by Leadership Team, Extended Leadership Team and other staff with administrative duties	Yes	Common practice	Legitimate Interest	Closure of file plus 7 years	Secure disposal
3.3	Correspondence created by all staff	Yes	Common practice	Legitimate Interest	Current academic year plus 7 years	Secure disposal
3.4	Professional Development Plans	Yes	Performance Management School Improvement	Contractual	Date of Leaving plus 7 years	Secure disposal
3.5	SEF and Ofsted action Plans	Yes	School Improvement	Legitimate Interest	Permanent (archived electronically)	Secure disposal
3.6	Admissions information - successful	Yes	Used from the period of the school receiving application up until the point where the child is admitted on roll. Used for some validation and cross checking of enrolment details.	Legal obligation, Vital interest, Legitimate interest, Consent (see admissions form)	Date of leaving plus 7 years	Secure disposal
3.7	Admission information – unsuccessful (including information about admissions appeals)	Yes	Data about applications which did not proceed to admittance is useful, but any intelligence gathered from it (e.g. previous school; appeals outcomes) is aggregated within the first year to a level being non-personal, after that the detailed data within the applications/appeals file could be deleted. The information is needed alongside the admissions policies of the time	Legitimate Interest	Date confirmed as not to be admitted plus 1 year	Secure disposal

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3.8	Proofs of address supplied by parent as part of the admission process	Yes	Required to ensure admissions criteria applied correctly	Vital Interests	Date of leaving plus 7 years	Secure disposal
3.9	Supplementary information from admission (e.g. medical information)	Yes	Safeguarding, Special Educational Needs, Personal Emergency Evacuation Plans, Reasonable adjustments	Vital Interests	Date of leaving plus 7 years	Secure disposal
<b>4. Students</b>						
4.1	Attendance registers	Yes	Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, individual form for one year after the pupil leaves school supports conversations about detailed attendance that may be needed to best support that child.  After that period, non-identifiable summary statistics are all that is required to support longer-term trend analysis of attendance patterns.	Legitimate Interest	Date of leaving plus 1 year detailed  Date of leaving plus 7 years basic stats	Secure disposal
			Under data minimisation, where paper records capture attendance and this record duplicates the electronic version, the paper record can be disposed of once transferred to a stable electronic format.  Attendance data will also reside in some operational systems such as cashless catering. In these systems the data should only be retained until the associated business processes have concluded (for example, payment of meals)		Date of data capture plus 1 year  Date of leaving plus 1 year	

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	Basic file description	Data Protection Issues	Justification	Legal basis for Lawful Processing	Retention period	Action at the end of the administrative life of the record
4.2	Pupil / Student Attainment - Formative assessments	Yes	Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the school, it has little value in terms of retention.	Legitimate Reason	Date of leaving plus 7 years	Secure disposal
4.3	Pupil / Student Attainment - Summative assessments	Yes	Summative attainment is the main outcome of what the child 'attains' in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is passed on smoothly as a child moved phase, it is not always the case and thus retaining the names alongside the main attainment data for 1 year after the pupil has left the school feels proportionate.  Trend analysis is important, 3-5 years is often the 'trend' people look at, but longer may be relevant. Whilst this must be fully flexible in reporting small sub groups, then aggregated summaries that have no risk of identifying individuals are all that are typically needed to be retained.	Vital Interest	Date of birth plus 235 years	Secure disposal
4.4	Pupil / Student behaviour	Yes	This is all relevant for managing children when in school. 1 year after leaving school allows a period of handover to next institution with conversations supported by rich data if relevant.	Legitimate Reason	Date of leaving plus 1 year	Secure disposal

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4.5	Pupil / Student exclusion	Yes	Exclusions data should be passed on to subsequent settings. That school then has responsibility for retaining the full history of the child. If a private setting or the school is unsure on where the child has gone, then the school should ensure that the LA already has the exclusion data.	Legal Obligation	Date of leaving plus 7 years	Secure disposal
4.6	Student paper files – Primary	Yes	Paper record of individual issues relating to student	Vital Interest	Date of leaving transfer to Secondary School	Secure disposal
4.7	Student paper files – Secondary	Yes	Paper record of individual issues relating to student	Vital Interest	Date of leaving plus 7 years	Secure disposal
4.8	Student electronic files	Yes	SIMS records and data records	Various	Date of leaving plus 7 years (except CP and by consent or where superseded above)	Secure disposal
4.9	SEND files	Yes	Various correspondence	Various	Date of leaving plus 7 years (except CP)	Secure disposal
4.10	Educational trips	Yes	Safeguarding, Processing payments and bookings	Vital Interest	Current year plus 2 years	Secure disposal
4.11	Video footage / images of student	Yes	Educational purposes including reviewing performance (e.g. PE, Drama, Dance performances); evidencing progress and for external examination evidence; and other educational purposes used internally	Legitimate Reason	Use for Internal purposes: When no longer required, no longer than leaving date + 1 year. Any longer through consent. Use for External assessment: Date of leaving + 1 year.	Secure disposal
<b>5. Examinations</b>						
5.1	Examination entries	Yes	Procedural requirement	Vital Interest	Date of Birth plus 25 years	Secure disposal
5.2	Examination entries	Yes	Procedural requirement, billing for non-attendance in accordance with Examination Policy	Legitimate Reason	Date of leaving plus 7 years	Secure disposal
5.3	Concessions records	Yes	Procedural requirement	Vital Interest	Date of leaving plus 7 years	Secure disposal
5.4	Exam certificates	Yes	Educational obligation	Vital Interest	Date of leaving plus 7 years	Secure disposal
5.5	Exam statement of results	Yes	Educational obligation	Vital Interest	Date of Birth plus 25 years	Secure disposal

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5.6	Records of appeals	Yes	Procedural requirement	Vital Interest	Date of leaving plus 7 years	Secure disposal
<b>6. Personnel Records</b>						
6.1	Timesheet	Yes	Audit trail and efficiency comparison	Contractual Obligations	Current year plus 3 years	Secure disposal
6.2	Staff personnel files	Yes	Payroll, Performance Management, Contract, Medical	Contractual Obligations	Date of leaving plus 7 years	Secure disposal
6.3	Recruitment records	Yes	Legal and procedural requirement	Legal Obligation	Successful applicants: Personnel file Unsuccessful applicants: Date of interview plus 1 year	Secure disposal
6.4	References	Yes	Legal requirement	Legal Obligation	Date of leaving plus 7 years	Secure disposal
6.5	DBS checks (information not certificates)	Yes	Legal requirement	Legal Obligation	Not retained	Secure disposal
6.6	Right to work in the UK (evidence of right to work in the UK)	Yes	Legal requirement	Legal Obligation	Date of leaving plus 7 years	Secure disposal
6.7	Disciplinary Procedure	Yes	Procedural requirement	Contractual Obligation	Case unfounded: immediate disposal Written warning: 6 months Final written warning: 12 months Dismissal: date of dismissal plus 7 years	Secure disposal
6.8	Records relating to accident / injury at work	Yes	Procedural requirement	Legal Obligation	Permanent: archived electronically	n/a
6.9	Payroll records	Yes	Legal requirement to pay staff correctly and maintain accurate records for HMRC, pensions etc.	Legal Obligation	Permanent: archived electronically	n/a
<b>7. Health &amp; Safety</b>						
7.1	Accessibility Plans	Yes	Legal requirement	Legal Obligation	Date of leaving plus 7 years	Secure disposal

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	Basic file description	Data Protection Issues	Justification	Legal basis for Lawful Processing	Retention period	Action at the end of the administrative life of the record
7.2	Accident Reporting	Yes	Legal requirement Monitor Trends	Legal Obligation	Permanent: archived electronically	n/a
7.3	Statutory Training	Yes	Legal requirement in line with post holders e.g. Safeguarding, COSHH for cleaning staff etc	Legal Obligation	Date of leaving plus 7 years	Secure disposal
7.4	Risk Assessment	Yes	Proportional to the risk. May be legally required, following guidance or good practice	Vital Interest	Permanent: archived electronically	n/a
7.5	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Comply with Health and Safety obligations	Legal Obligation	Last action plus 40 years	Secure disposal
7.6	Fire Precautions log books	No	Legal requirement Monitor compliance	Legal Obligation	Current year plus 7 years	Secure disposal
<b>8. Closed Circuit Television (CCTV)</b>						
8.1	Routine footage	Yes	To have a reasonable age of footage to refer back on where an event may not be immediately apparent.	Vital Interest	Routine deletion after 30 days. If used in the course of an investigation, up to 6 months	Secure disposal
8.2	Footage stored due to exceptional incidents	Yes	To maintain evidence for future criminal proceedings	Legal Obligation	As long as required (determined by outcome, e.g. police investigation)	Secure disposal
<b>9. Administrative</b>						
9.1	Employer's Liability Certificate	No	Legal Obligation	Legal Obligation	Permanent: archived electronically	n/a
9.2	Inventories of equipment & furniture	No	Financial and audit purposes	Vital Interest	Current year plus 6 years	Disposal
9.3	Visitors book	Yes	Safeguarding Fir Plan	Legitimate Interest	Current year plus one year	Secure disposal
<b>10. Finance</b>						
10.1	Annual Accounts	Yes		Legal Obligation	Current year plus 6 years	Secure disposal

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	Basic file description	Data Protection Issues	Justification	Legal basis for Lawful Processing	Retention period	Action at the end of the administrative life of the record
10.2	Contracts	Yes		Legal Obligation	7 years after contract end date	Secure disposal
10.3	Orders/invoice	Yes		Vital Interest	Current year plus 6 years	Secure disposal
10.4	Budget report etc	Yes		Vital Interest	Current year plus 6 years	Secure disposal
10.5	Debtors' Records	Yes	Appropriate pursuance of debts to the Trust	Legal Obligation	Current year plus 25 years	Secure disposal
10.6	Cheque books/paying in book etc	Yes		Vital Interest	Current year plus 6 years	Secure disposal
10.7	Bank statements	Yes		Vital Interest	Current year plus 6 years	Secure disposal
10.8	Petty cash information	Yes		Vital Interest	Current year plus 6 years	Secure disposal
<b>11. Property</b>						
11.1	Title Deeds	No		Legal obligation	Permanent	Secure disposal
11.2	Plans	No		Legal obligation	Permanent	Secure disposal
11.3	Maintenance and contractors	Yes		Legal obligation	Current year plus 6 years	Secure disposal
11.4	Leases	No		Legal obligation	Expiry of lease plus 6 years	Secure disposal
11.5	Reports (incidents)	Yes		Legal obligation	Current year plus 6 years	Secure disposal
11.6	Maintenance records	Yes		Legal obligation	Current year plus 6 years and reviews	Secure disposal
11.7	Grant information	Yes		Legal obligation	Current year plus 6 years and reviews	Secure disposal

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	Basic file description	Data Protection Issues	Justification	Legal basis for Lawful Processing	Retention period	Action at the end of the administrative life of the record
<b>12. Department for Education / Ofsted</b>						
12.1	Ofsted reports	No		Vital Interest	Permanent: archived electronically	n/a
12.2	Returns	No		Legal obligation	Permanent: archived electronically	n/a
<b>13. Third Party Providers</b>						
13.1	Service level agreements	Yes		Vital interest	Date of expiry plus 6 years	Secure disposal