

DATA RETENTION POLICY

1. Aims

This policy sets out a structured approach to reviewing and destroying records in relation to Alpha Plus Group (which includes Head Office and all the schools and colleges in the Group).

2. Legislation and guidance

This policy meets the requirements of the UK GDPR and the provisions of the Data Protection Act 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on [storage limitation](#).

This policy upholds the requirement that personal data is kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. As part of this requirement Alpha Plus Group:

- Continually assesses the data held and why it is needed
- Carefully considers how long personal data is kept
- Regularly reviews and erases or anonymises personal data when it is no longer needed
- Has processes in place to comply with requests for erasure under 'the right to be forgotten'
- Identifies any personal data that needs to be kept for public interest archiving, scientific or historical research, or statistical purposes

3. Retention periods

The UK GDPR does not specify time limits for different types of data and allows organisations to set appropriate retention periods based on the purposes for processing. The table on the following pages is intended to establish standard retention periods for different categories of personal data. There may be cause for discretion where, for example, early deletion is possible as the data is no longer needed, or it is deemed necessary to keep data for longer due to a risk of litigation or a request from an outside body.

4. Disposal of records

Where data is no longer needed, it will be anonymised or securely destroyed. This applies to paper records, electronic information and biometric information. For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on Alpha Plus Group's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

3. Links with other policies

This retention policy is linked to our:

- Data Protection policy
- Privacy policy (pupils and parents)
- Privacy policy (staff)

4. Monitoring arrangements

The DPO is responsible for monitoring and reviewing this policy in collaboration with the Data Protection Governance Group at Head Office. The policy will be reviewed and updated if any changes are made to legislation that affect Alpha Plus Group's practice. Otherwise, this policy will be reviewed **every 2 years** and shared with the full governing board.

Item	Record	Retention period	Action at the end of the retention period	Retention period required by law?
1. Pupils				
1.1	Admission registers	Six years from the end of the financial year the last entry relates to	Original record to be transferred to the archives. SHRED/DELETE copies and back-ups	Yes
1.2	Attendance registers	Six years from the end of the financial year the entry relate to	Review for further retention in the case of contentious dispute. SHRED/DELETE including back-ups and copies.	Yes
1.3	Child protection records	DOB of the pupil + 100 years	<p>Review for further retention in the case of contentious dispute</p> <p>SHRED/DELETE</p> <p>Notes</p> <ol style="list-style-type: none"> 1. Child protection information must be copied and sent under separate cover to the new school/college whilst the child is still under 18. Secure transit should be ensured and confirmation of receipt should be obtained 2. Where a child is removed from roll to be educated at home, the file should be copied 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 	No

			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	Biometric information (e.g. fingerprints to be used as part of an automated biometric recognition system)	For as long as the information is required for the individual's use of 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 the Group, and where the parent or pupil withdraws consent or the pupil objects to its use.	No
1.5	Medical records held by the Group	<p>DOB of the pupil + 24 years; or Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident - whichever is longer.</p> <p>The 24 year period is based on the fact that once the child turns 18 years old they have a certain amount of time (known as a limitation period) in which to bring claims against the Group. The longest of these limitation periods is six years, albeit that some periods can be extended by the courts.</p>	Review for further retention in the case of contentious disputes SHRED/DELETE	No

1.6	Counselling records held by the Group	DOB of the pupil + 24 years; or Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident - whichever is the longer.	Review for further retention in the case of contentious disputes SHRED/DELETE	No
2. Pupil files				
2.1	Pupil files (including public examination scripts, marks & results)	DOB of the pupil + 24 years; or Six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident - whichever is the longer.	Review for further retention in the case of contentious disputes, for example, parental complaints, disciplinary matters, pupil exclusions, bullying incidents and subject access requests SHRED/DELETE When reviewing pupil files, the Group should have regard to other applicable sections of this policy. Any examination certificates left unclaimed should be returned to the appropriate Examination Board.	No
2.2	Internal examination scripts, marks and results	Scripts: Scripts from weekly or monthly tests: keep until the end of the next academic year. Scripts from termly or yearly tests: keep until the end of the next academic year. Marks and results: If the purpose of the test is to progress the child (either	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 matter, pupil exclusions, bullying incidents and subject access requests.	No

		<p>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>		
2.3	Special Educational Needs files, reviews and Individual Education Plans	DOB of the pupil + 24 years; or six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the Incident, whichever is longer.	Review for further retention in the case of contentious disputes SHRED/DELETE	No
2.4	Statement of Special Education Needs (SEN) and Education Healthcare (EHC) Plans	DOB of the pupil + 24 years; or six years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the Incident, whichever is longer.	SHRED/DELETE unless legal action pending The Statement/Plan belongs to the LA which makes and maintains the Statement/Plan	Yes
2.5	Documents that are required to be retained for each migrant enrolled under Tier 4 (General) Student or Tier 4 (Child) Student visas	<p>Through the period of sponsorship and for whichever is the shorter period of either:</p> <ul style="list-style-type: none"> One year from the date that the School ends sponsorship of the Tier 4 student, or 	SHRED/DELETE	No

		<ul style="list-style-type: none"> If the Tier 4 student is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents. 		
3. Permissions				
3.1	Parental permission slips for school/college 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
3.2	Parental permission slips for school/college trips – where there has been a major incident, accident, injury or near miss involving anyone on the trip	<p>DOB of the pupil involved in the incident + 24 years; or</p> <p>Six years from the date of the incident if the pupil was 18 years old at the date of the incident</p> <p>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</p>	Review for further retention in the case of contentious disputes otherwise SHRED/DELETE	No

4. Admission department				
4.1	Admission and parental contract documents including registration form, letter of offer and acceptance form	Six years from date of leaving the Group	Review for further retention in the case of contentious disputes SHRED/DELETE	No
4.2	Admissions documents relating to applicants who did not join the Group	One year, except any documentation relating to appeal proceedings, which should be retained for at least two years. Any financial records should be kept for six years from the end of the financial year to which the records relate.	Review for further retention in the case of relevance to contentious disputes. SHRED/DELETE	No
4.3	Records of parent/guardian details, including bank details	Six years from date of pupil leaving the Group.	Review for further retention in the case of contentious disputes SHRED / DELETE	No
4.4	Financial information in respect of school trips	Seven years for audit purposes	Review for further retention in the case of contentious disputes SHRED/DELETE	
4.5	Bursary application forms, which includes disclosure of financial circumstances	Unsuccessful applications retained for 1 year in case of appeal/dispute and destroyed upon notification of unsuccessful application. Successful bursary applications kept for 6 years from the expiry of the award.	SHRED / DELETE	No

5. Employment				
5.1	Employment or personnel records including recruitment information, contracts of employment, changes to terms and condition, disciplinary matters, grievance procedures	Archive at end of employment and keep securely for at least 50 years	Records of anyone with child protection concerns (even if not proved) should be retained for at least 50 years after termination of employment. Review whether further retention is necessary. SHRED/DELETE	No
5.2	Single central register	Remove employee details from live SCR when employment ends and keep on archive for at least 50 years	Review whether further retention is necessary. SHRED/DELETE	No
5.3	Childcare disqualification declarations	Old childcare disqualification declarations in relation to people associated with staff members should not be retained and should be removed from personnel files.	SHRED/DELETE	Yes
5.4	Records and documents relating to membership of and contributions to the Teachers' Pension Scheme	Date of birth of employee plus 100 years	Review whether further retention is necessary. Decisions in relation to the Teacher's Pension Scheme may have ramifications beyond six years, and may be queried at any time by members and the Teacher's Pension Scheme	No
5.5	Employment references received	Archive at end of employment and keep securely for at least 50 years.	Review whether further retention is necessary. Consider whether any new concerns raised by social services or other agencies. If none, SHRED/DELETE	Yes

5.6	Employment references provided	At least 1 year from the submission of the reference.	Review whether further retention is necessary. If a reference has been agreed with a former employee, it will need to be kept on file until they reach retirement. For all other references, consider whether there have been any recent reference requests for the relevant individual. If none, SHRED/DELETE	No
5.7	Working time opt-out forms	Two years from the date on which they were entered into	SHRED/DELETE	Yes
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 of any 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	Six years from the end of the financial year to which the records relate	SHRED/DELETE	Yes
5.11	Maternity / paternity records. These include: <ul style="list-style-type: none"> •Records regarding Maternity / paternity payments made •Maternity certificates showing the expected week of confinement 	Six years from the end of the financial year to which the records relate	SHRED/DELETE	Yes

5.12	Sickness records required for the purposes of Statutory Sick Pay (SSP)	During employment and, after employment ceases, six years from the end of the financial year to which the record relate Consider keeping separately from absence records, which do not detail reason for absence.	SHRED/DELETE	Yes
5.13	Records in relation to hours worked and payments made to workers	Six years from the end of the financial year to which the record relate	SHRED/DELETE	Yes
5.14	Consents for the processing of personal data and sensitive personal data (known as special category personal data under the UK GDPR)	For as long as the data is being processed and up to six years afterwards.	SHRED/DELETE	Yes
5.15	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. Once the conviction is spent, should be deleted unless it is an excluded profession.	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 workers sponsored by the school under Tier 2 or Tier 5	Through the period of sponsorship and for whichever is the shorter period of either: one year from the date that the sponsorship of the Tier 2 or 5 migrant ends, or if the Tier 2 or 5 migrant is no longer sponsored, the point at which a Home Office compliance officer has examined and approved the documents	SHRED/DELETE	No
5.18	Recruitment records of unsuccessful candidates	Six months after notifying unsuccessful candidates	SHRED/DELETE	No
5.19	Training records	Whilst employment continues and up to six years after employment ceases	SHRED/DELETE	No
5.20	Annual leave records	Six years from the end of the calendar year	SHRED/DELETE	No
5.21	An Employee's bank details	Until last payment made	SHRED/DELETE	No
5.22	Records of advances for season tickets and loans to employees	Whilst employment continues and up to six years after Repayment	SHRED/DELETE	No
5.23	Death Benefit Nomination and Revocation Forms	Whilst employment continues and up to six years after payment of benefit	SHRED/DELETE	No
5.24	Personnel and appraisal documents	Whilst employment continues and up to six years after employment ceases	SHRED/DELETE	No

5.25	Personal expenses records	Whilst employment continues and up to six years after end of employment	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 – DOB + 100 years	Review for further retention in the case of enforcement action or contentious dispute 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 control measures relating to substances hazardous to health under the Control of Substances Hazardous to Health (COSHH) regime	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
6.4	Health records for licensable asbestos work	At least 40 years from the date if 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	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
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)	Five years	Review for further retention in the case of enforcement action contentious disputes SHRED/DELETE	Yes
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	DOB of the pupil involved in the incident + 21 years; or Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	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) reports or own record	Minimum statutory retention period is at least 3 years but, we recommend that the record is kept for DOB of the pupil involved in the incident + 21 years; or Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	Review for further retention in the case of enforcement action or civil claims for personal injury SHRED/DELETE	Yes
7.3	Incident investigations and reports, risk assessments and other relevant documents where there has been an accident or incident	DOB of the pupil involved in the incident + 21 years; or Three years from the date of an incident which may become contentious if the pupil was 18 years old at the date of the incident	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, training records, records of emergency evacuations	Three years (in the absence of a specific accident, incident, dangerous occurrence or notifiable diseases)	Review for further retention in the case of enforcement action or contentious disputes SHRED/DELETE	No
8.2	Copies of documents, including health and safety files, prepared	To be decided by the Group depending on the record - records should be retained as long as is	Consider how long likely to be relevant then SHRED/DELETE	N/A

	pursuant to the Construction (Design and Management) Regulations 2015	reasonably necessary to inform on future construction projects at the Group site		
9. Investigations, reviews and inquiries				
9.1	Documents relevant to IISCA	Indefinitely until further guidance is received from the IISCA	Review once the Inquiry has been completed.	No - unless a school/ college has received a formal notice from IISCA
9.2	Internal reports and investigations into accidents / incidents Copies of reports submitted to external agencies / regulators such as Ofsted, Health and Safety Executive, Local Authority External reports, reviews, investigations and inquiries for example inquests and public inquiries	Where the investigation / inquiry / report has been necessitated as a result of a specific incident, 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. Where this relates to pupil (DOB +21 years); or Three years from the date of an incident which may become contentious if the pupil was 18	SHRED/DELETE	No

10. Alumni records				
10.1	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 employees do not apply to alumni), treating them the same can be considered good practice and may be more straightforward to implement in practice	As set out in section 6 above	As set out in section 6 above	No
10.2	Records of communication preferences and basic biographical details (name and date of birth for identification purposes)	Those who have not responded after 2 invitations to join the alumni organisation will be removed from the database within 3 months of the last contact Those who have joined and stated a communication preference will have their preference held indefinitely. This information is kept so that we can ensure that individuals are not contacted in a	SHRED/DELETE in the case of non-contact individuals	No

		way that contradicts their preferences.		
10.3	General alumni correspondence, membership forms etc	Contact details for members will be held until either a member cancels their membership or dies.	SHRED/DELETE	No
10.4	Data on achievements and interests	This information will be kept indefinitely for the purpose of historical research.	SHRED/DELETE	No
10.5	Gift Aid information	Indefinitely until informed that the individual is no longer a taxpayer. Donors sign up to this via consent.	SHRED/DELETE	No
12. CCTV, videos and photographs				
12.1	CCTV footage	Up to 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>The Group should consider the relevant limitation periods for claims being brought against the Group and seek advice as necessary.</p>	No
12.2	Photographs of pupils for internal administration	These photographs should be retained for as long as they are	SHRED/DELETE	No

	purposes e.g. to identify the pupil or photographs used on security passes	required for the purpose for which they were taken.	Review for further retention in the case of relevance to contentious disputes.	
12.3	Photographs or videos of pupils taken for promotional purposes e.g. photographs for use in the Group prospectus or a video of pupils on the Group'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
12.4	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