

# Bishop Bewick Catholic Education Trust

<b>Policy Title:</b>	<b>Data Retention Policy</b>			
<b>Date of Approval:</b>	<b>February 2024</b>			
<b>Approved by:</b>	<b>Trust Board</b>			
<b>Date of next review:</b>	<b>February 2027</b>			
<b>Applies to:</b>	<b>All school &amp; Trust settings</b>			
<b>Change log:</b>				
<b>Version</b>	<b>Author</b>	<b>Date</b>	<b>Approved by</b>	<b>Change</b>
1	COO/CCO	Feb 2024	Trust Board	Original

# BBCET Data Retention Policy

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## Introduction

The main aim of this policy is to enable Bishop Bewick Catholic Education Trust and its schools to manage data in compliance with the General Data Protection Regulations (GDPR) and retention periods. As an organisation we collect, hold and store significant amounts of data and information; this policy provides a framework of retention and disposal of information and documents.

The BBCET is committed to the principles of data protection, including the principle that information is only to be retained for as long as necessary for the purpose concerned. The Trust has a designated Data Protection Lead (DPL), Michael Ashton-Thompson at Trust-level, who will interface with the Trust Data Protection Officer (DPO), Chapman Data & Information Services LTD (dpo@chapmandis.co.uk).

Each school must identify a DPL and designated 'Area Leads' i.e., for Office Administration, SEN[D], and Safeguarding information (see table below). Area Leads are responsible for overseeing the maintenance of specific areas of data during retention periods and the timely secure disposal procedures. The school's DPL oversees all aspects.

### School

- DPL

#### Area Leads

1. Curriculum Lead
2. Headteachers/Senior Leadership Team
3. Office Administrator
4. SEN[D]Co
5. DSL

### Trust

- DPL

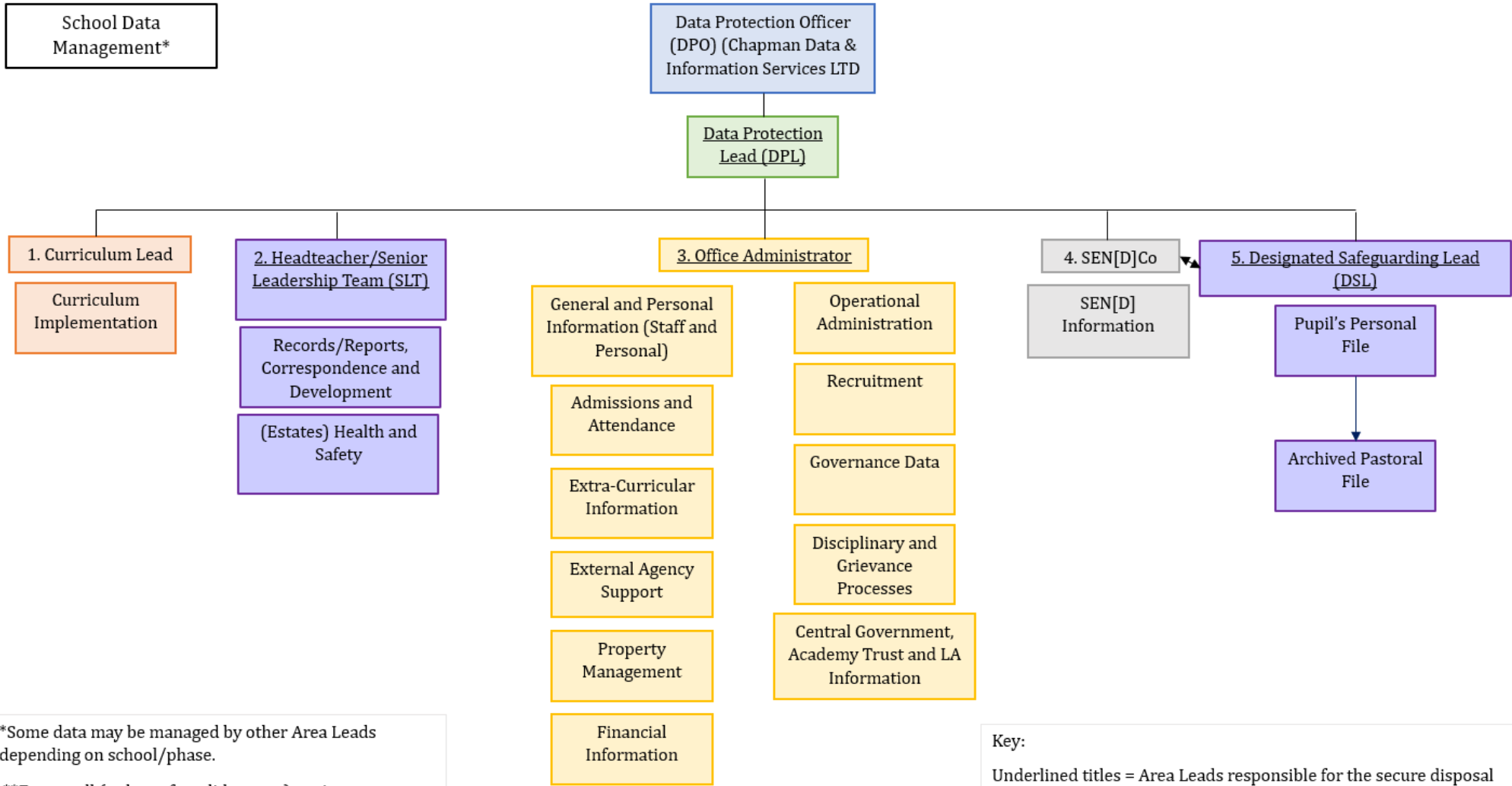
#### Area Leads

- Head of H&S and Estates
- COO
- HR
- Head of Governance

Figures 1 and 2 in the following pages outline the details of responsibilities under the remit of each Area Lead, the DPL and DPO at school and Trust-level. Further details are listed in the Retention Schedules (sections 11-18).

**If a document or piece of information is reaching the end of its stated retention period, but you are of the view that there are good reasons to retain that data for longer, please refer to The Data Protection Officer (DPO) via either the school or Trust Data Protection Lead (DPL) who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.** Data retention provisions in this policy are derived from the IRMs Toolkit 2019: <https://irms.org.uk/page/SchoolsToolkit>. If you would like a copy of the toolkit, please contact the Communications and Compliance Officer.

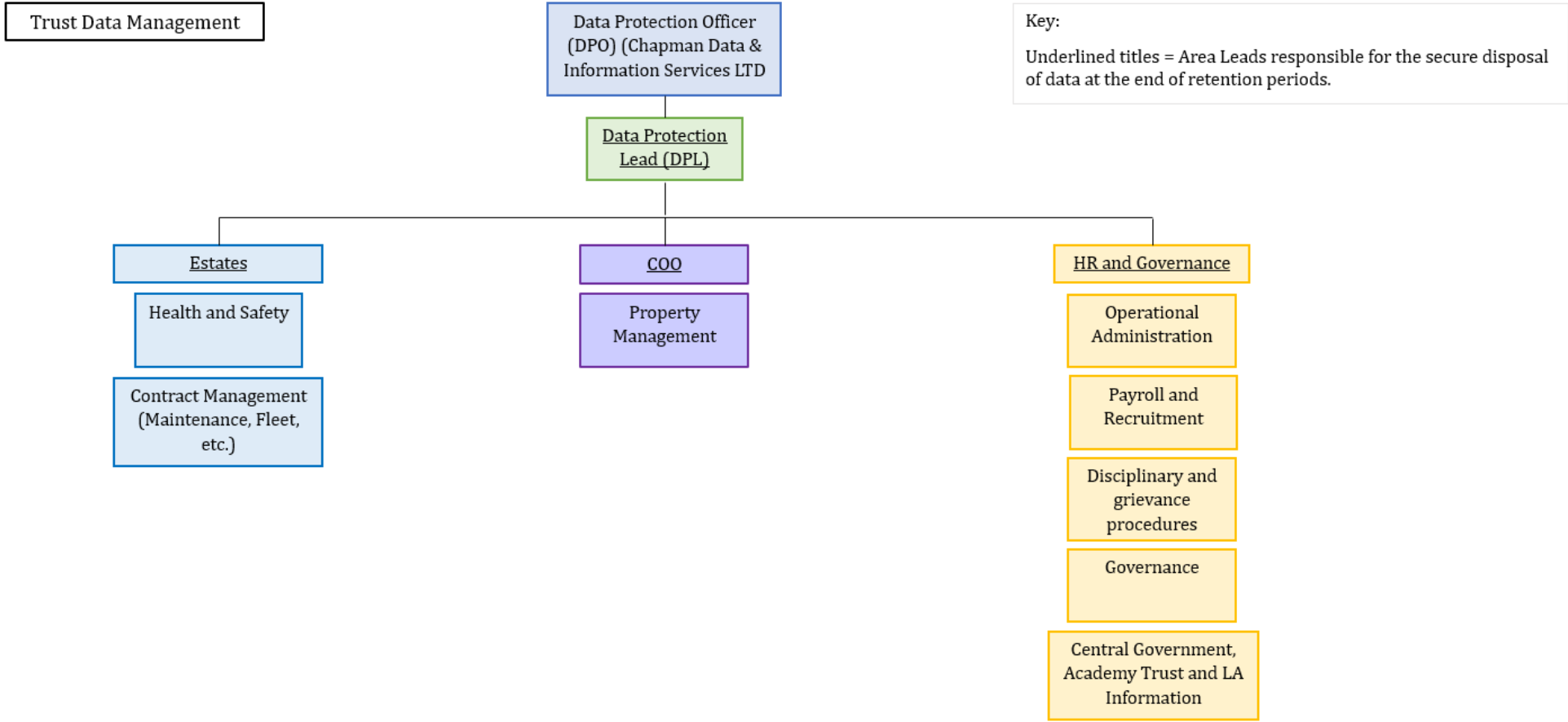
Figure 1. Flow chart of those responsible at school-level for the maintenance, retention, and disposal of data, distributed by Area Lead, DPL and DPO.



\*Some data may be managed by other Area Leads depending on school/phase.  
 \*\*Ensure all (unless of a valid reason) copies are retained by the Trust Finance Team only.

Key:  
 Underlined titles = Area Leads responsible for the secure disposal of data at the end of retention periods.

Figure 2. Flow chart of those responsible at Trust-level for the maintenance, retention, and disposal data by Area Lead, DPL and DPO.



Key:  
Underlined titles = Area Leads responsible for the secure disposal of data at the end of retention periods.

Please note: all financial information is managed by the Trust Finance Team.

## **1.0 Policy statement**

The Bishop Bewick Catholic Education Trust is committed to maintaining the confidentiality of its information and ensuring that all records within schools and the Trust are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulations (GDPR), the Trust and its schools have a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The guidance in the policy is based on the IRMS toolkit 2019: <https://irms.org.uk/page/SchoolsToolkit>. The BBCET has created this policy to outline how records are stored, accessed, monitored, retained, and securely disposed of to meet statutory requirements.

## **2.0 Scope and purpose**

Under the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA 2018), schools need a policy setting out retention periods for the personal data or other data held for the duration of its business. All BBCET schools should operate under the guidance specified within this policy. This policy specifies the length of time for which records need to be retained and also lays down the basis for normal processing under both Data Protection and Freedom of Information legislation.

The purpose of this policy is to ensure:

- BBCET Schools manage all data against this policy in line with 'normal processing' under the Data Protection legislation and the Freedom of Information Act.
- Our schools can be confident about the secure disposal of information at the appropriate time.
- Information which is subject to Freedom of Information and Data Protection legislation will be available when required.
- Schools are not maintaining and storing information unnecessarily.

Schools should understand that there is no national sector-wide data retention policy that prescribes the length of time for which data should be retained. Some retention periods outlined in this policies Retention Schedule are good practice guidelines only and are largely derived from those published in the IRMS toolkit and by the DfE; they are not an exhaustive list. Therefore, in all cases, schools should ensure that they consider the requirements specific to their school when implementing these time frames.

### **3.0 Legal framework**

3.1 This policy has due regard to legislation, including, but not limited to, the following:

- General Data Protection Regulation
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)

3.2 This policy also has due regard to the following guidance:

- IRMS (2019) Toolkit for Schools
- DfE (2018) Data Protection: A toolkit for schools

3.3 This policy will be implemented in accordance with the following school policies and procedures:

- GDPR Policy (incl., Management Information System)
- Freedom of Information
- Privacy notice
- Accessible Users Policy
- Digital Continuity Statement

### **4.0 Responsibilities**

4.1 The school's Area Leads have the responsibility for maintaining its records and record-keeping systems in line with the statutory requirements.

4.2 The school DPL holds the overall responsibility for ensuring that this policy is implemented correctly.

4.3 The Trust DPL, with support from the DPO, is responsible for the management of records across the BBCET.

4.4 The Trust DPL is responsible for promoting compliance with this policy and reviewing the policy on an annual basis in conjunction with the DPO, Trust Executive Team, and Headteachers.

4.5 Area Leads are responsible for the management of staff members with access to specified data. Leads must ensure the storage, assessment, and timely disposal of data in their remit.

4.6 All staff members are responsible for ensuring that any records for which they are responsible are accurate, maintained securely and disposed of correctly as directed by Area Leads, and in line with the provisions of this policy.

4.7 The DPO and the Trust's internal auditors (Azets Holdings Ltd.) will carry out annual audits and advise the DPL and/or Area Leads as necessary on the appropriate treatment of any data held within the Trust.

## **5.0 Retention Schedule and Data Disposal Logs**

The Retention Schedules in sections 11-18, is derived from the IRMS toolkit for schools (2019), which outlines statutory provisions and guidance on data retention. School Area Leads are expected to manage their data using the Retention Schedule guidance and take account of the retention periods when they are creating new record keeping systems. If you are a Trust Area Lead or DPL, please refer to the Retention Schedule in the Academy toolkit from IRMS, located in the Trust's shared online area, or please contact the Communication and Compliance Officer, for a copy.

Under the Freedom of Information Act 2000, schools should also maintain a document listing the series of records which the school creates or maintains during its business. This policy references Data Disposal Logs (outlined in section 9 and exemplified in Annex 2), which schools and the Trust must keep as a record of timely secure data disposal in line with the Retention Schedule.

Upon the end of a retention period, schools and the Trust will dispose of data of via an approved secure disposal procedure/supplier (i.e., Restore PLC, Shred-it UK), regardless of the media (i.e., paper, electronic, photographic).

## **6.0 Digital Continuity Statement**

- 6.1 Digital data that are retained for longer than six years will be named as part of a Digital Continuity Statement (see Annex 1).
- 6.2 DPLs will identify any digital data that will need to be named as part of a Digital Continuity Statement.
- 6.3 The data will be archived to dedicated files on the Cloud server, which are password-protected.
- 6.4 Removeable storage devices will never be used to store data, subject to the Digital Continuity Statement.
- 6.5 DPLs will review the new and existing storage methods across the Trust annually.

## **7.0 Identifying information**

- 7.1 Under the GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school or Trust ensures that appropriate measures are in place for individuals to exercise this right.
- 7.2 Whenever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification.
- 7.3 Once an individual is not associated with the school or Trust, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data are used, for example the month of birth rather than a specific date, and the data are



blurred slightly.

- 7.4 When data are required to be retained over time, the school removes any personal data that are not required and keeps only the data needed.

## **8.0 Storing and protecting information**

- 8.1 All DPLs will undertake a risk analysis to identify which records are vital to school management, and these records will be stored in the most secure manner.
- 8.2 Backed-up information is stored via Cloud services.
- 8.3 If confidential paper records are kept, these should be stored in a locked filing cabinet, drawer or safe with restricted access.
- 8.4 Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 8.5 Digital data are coded, encrypted or password-protected. These should only be stored online via Cloud services.
- 8.6 Removeable storage devices should not be used for any data storage and are viewed as bad practice in Trust schools.
- 8.7 All electronic devices are password-protected to protect the information on the device.
- 8.8 If possible, the school enables electronic devices to allow the remote blocking or deletion of data.
- 8.9 Staff and governors should only use personal devices in cases where the work is curriculum based (i.e., lesson planning), or the data accessed is securely encrypted via web services (i.e., Microsoft 365).
- 8.10 Staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 8.11 Emails containing sensitive or confidential information are password-protected to ensure that only the recipient can access the information. The password is shared with the recipient in a separate email. Staff should avoid using full names of pupils and staff in emails (advised to use abbreviations/initials).
- 8.12 Staff should use email as a communications tool, not as a record of information. If information included in an email needs to be retained, it should be transferred to an appropriate file.
- 8.13 Staff should use and manage email, including retention, as directed via the school's M365 use policy. For most users this will mean deleting emails on an annual basis. However, for all users, emails should always be securely disposed of after 7 years.
- 8.14 Circular emails to parents are sent blind carbon copy (Bcc), so email addresses are not disclosed to other recipients.
- 8.15 Any paper-based data taken off site must be securely stored at all times. Staff should take

appropriate action to ensure this. The person taking the information from the school premises accepts full responsibility for the security of the data.

8.16 Before sharing data, staff always ensure that:

- adequate security is in place to protect them and pupils;
- the data recipient has been outlined in a privacy notice (i.e., application forms with governors).

8.17 All staff will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.

8.18 Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are always supervised.

8.19 The SLT with responsibility for site security must ensure the buildings have robust measures in place to prevent vandalism or theft. Any weaknesses or occurrences of vandalism etc., should be reported to the Headteacher and extra measures to secure data storage will be put in place.

8.20 All staff should note that an unauthorised disclosure may result in disciplinary action.

8.21 The DPL is responsible for continuity, and recovery measures are in place to ensure the security of protected data.

## **9.0 Disposal of Data**

9.1 When the disposal of information is outlined as **secure** disposal, it will be shredded or permanently deleted (electronic information).

9.2 Electronic copies of any information and files will be destroyed in accordance with the retention periods.

9.3 By the 31<sup>st</sup> of September each year, the DPL will approve all secure disposal procedures via the Data Disposal Log for the previous academic year.

## Section A – Retention of Pupil Data

### 10.0 Management of Pupil data

10.1 Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed in succession to each school that a pupil attends and include all the personal information relating to them.

10.2 The following information is stored in the pupil record and will be easily accessible (Whilst at the school, aspects of a Pupil's record may be stored in multiple secure places i.e., SIMS, CPOMS, M365):

- forename, surname, sex, and date of birth;
- unique pupil number;
- date when the file was opened;
- name of the school, admission number, date of admission and date of leaving, where appropriate;
- note of the date when the file was closed/archived, if appropriate.
- ethnic origin, religion and first language (if not English);
- any preferred names;
- position in their family, for example eldest sibling;
- emergency contact details and the name of the pupil's doctor;
- any allergies or other medical conditions of which it is important for the school to be aware;
- names of the pupil's parent(s)/carer(s), including their home address(es) and telephone number(s);
- any other agency's involvement, for example a speech and language therapist.
- admissions form;
- details of any special educational needs and disability (SEND);
- if the pupil has attended an early years setting, the record of transfer;
- Privacy notice (aka 'fair processing notice') – only the most recent notice will be included;
- annual written reports for parents/carers;
- notes relating to major incidents and accidents involving the pupil;
- any information about an education, health and care plan (EHCP) and support offered in relation to the EHCP;
- any notes indicating that Child Protection disclosures and reports are held;
- any information relating to exclusions;
- any correspondence with parents/carers or external agencies relating to major issues, for

- example mental health;
- notes indicating that records of complaints made by parents/carers or the pupil are held.
- 10.5 The following information is subject to shorter retention periods and therefore will be stored separately in a personal file for the pupil in the school office:
- absence notes;
  - parental and, where appropriate, pupil consent forms for educational visits, photographs and videos and so on;
  - correspondence with parents/carers about minor issues, for example behaviour.
- 10.6 Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope in a securely locked filing cabinet – a note indicating this is written on the pupil’s file.
- 10.7 Hard copies of complaints made by parents/carers or pupils are stored in a file in a secure area of the school – a note indicating this is written on the pupil’s file.
- 10.8 Copies of accident and incident information are stored separately on the school’s management information system and held in line with the retention periods outlined in this policy – a note indicating this is written on the pupil’s file. An additional copy may be placed in the pupil’s file in the event of a major accident or incident.
- 10.9 The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
- 10.10 The only exception of 10.9 is if any records placed in the pupil’s file have a shorter retention period and may need to be removed. In such cases, the Area Lead responsible for securely disposing of records will remove them.
- 10.11 Electronic records relating to a pupil’s record will also be transferred to the pupils’ next school.
- 10.12 (Primary schools only) The school will not keep any copies of information stored within a pupil’s record unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.
- 10.13 (Secondary schools only) If any pupil attends the school until the statutory school leaving age, the school will keep the pupil’s records until the pupil reaches the age of 25 years.
- 10.14 The school will, whenever possible, avoid sending a pupil’s record by post. When a pupil’s record must be sent by post, it will be sent by registered post with an accompanying list of the files included. The school that it is sent to is required to sign a copy of the list to indicate that it has received the files and return this to the school.

## 11.0 Retention Schedule – Pupil Management Data

- 11.1 The table below outlines the school’s retention periods for individual pupil records holding both personal and statistical data.
- 11.2 This data is maintained by the Office Administrator, DSL, and SEN[D]Co, and must be securely disposed of and recorded in the Data Disposal Log upon the end of the retention period unless a valid reason is given to retain data longer than the retention period.
- 11.3 The Retention Schedule refers to series’ of records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.
- 11.4 ‘Pupil Data’ Retention Schedule:

<b>11.4.1 Admissions Process</b>	
<b>Area Lead: Office Administrator</b>	
Basic file description	Retention Period [Operational]
All records relating to the creation and implementation of the School Admissions Policy	Life of the policy + 3 years, then review
Admissions – if the admission is successful	Date of admission + 1 year
Admissions – if the appeal is unsuccessful	Resolution of case + 1 year
Register of Admissions	Date of register + 3 years
Admissions – Secondary Schools – Casual	Current academic year + 1 year
Proofs of address supplied by parents as part of the admissions process	Current academic year + 1 year
Supplementary information form including additional information such as religion, medical	
For successful admissions	Add to pupil file
For unsuccessful admissions	After appeals process is completed

<b>11.4.2 Pupil’s Educational Record</b>	
<b>Area Lead: DSL</b>	
Basic file description	Retention Period [Operational]
Pupil’s Educational Record required by The Education (Pupil Information) (England) Regulations 2005:	
Primary	Whilst pupil is at the school
Secondary	Date of birth of the pupil + 25 years
Examination Results – pupil copies:	
Public	Add to pupil file
Internal	Add to pupil file

Child protection information held on pupil file	Add to pupil file - if there is an ongoing investigation upon the date of birth of the pupil + 25 years, retain for duration of investigation
Child protection information held in separate files	Add to pupil file – all other copies must be retained until the date of birth of the pupil + 25 years, then review

### 11.4.3 Attendance

#### Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
Attendance Registers	Date of entry + 3 years
Correspondence relating to any absence (authorised or unauthorised)	Current academic year + 2 years

### 11.4.4 SEN[D] information

#### Area Lead: SEN[D]Co and DSL

Basic file description	Retention Period [Operational]
Special Educational Needs files, reviews and Education, Health, and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy.	Date of birth of the pupil + 31 years - Education, Health and Care Plan is valid until date of birth of the pupil + 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act

## 12.0 Retention Schedule – Curriculum and Extra Curricular Activities Data

- 12.1 The table below outlines the school's retention periods for Curriculum and Extra Curricular Activities involving both personal and statistical data on pupils.
- 12.2 This data is maintained by the Curriculum Lead, Office Administrator and DSL, and must be securely disposed of and recorded in the Data Disposal Log upon the end of the retention period unless a valid reason is given to retain data longer than the retention period.
- 12.3 The Retention Schedule refers to series' of records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.
- 12.4 'Curriculum and Extra Curricular Activities' Retention Schedule:

### 12.4.1 Statistics and Management Information

#### Area Lead: Curriculum Lead, Office Administrator and DSL

Basic file description	Retention Period [Operational]
Curriculum returns	Current academic year + 3 years

### 12.4.1 Statistics and Management Information

Area Lead: Curriculum Lead, Office Administrator and DSL

Basic file description	Retention Period [Operational]
Examination Results (school's copy)	Current academic year + 6 years
SATS records:	
Results	<ul style="list-style-type: none"><li>- Individual - Add to pupil file</li><li>- Cohort - Composite record of all the whole year's SATs results: current academic year + 6 years</li></ul>
Examination Papers	Until any appeals/validation process is complete
Published Admission Number (PAN) Reports	Current academic year + 6 years
Value Added and Contextual Data	Current academic year + 6 years
Self-Evaluation Forms:	
Internal moderation	Current academic year + 1 year
External moderation	Until superseded

### 12.4.2 Implementation of Curriculum

Area Lead: Curriculum Lead

Basic file description	Retention Period [Operational]
Schemes of work	Current academic year + 1 year
Timetable	Current academic year + 1 year
Class record books	Current academic year + 1 year
Mark books	Current academic year + 1 year
Record of home- work set	Current academic year + 1 year
Pupil's work	Current academic year, then returned to pupil - if this is not the school's policy, then current academic year + 1 year

### 12.4.3 School Trips

Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
Parental consent forms for school trips where there has been no major incident	Schools may wish to complete a risk assessment to assess whether the forms are likely to be required, hence schools should make a decision to dispose of the consent forms at the end of the trip (or at the end of the academic year) - this is a pragmatic approach and if in doubt the school should seek legal advice
Parental permission slips for school trips – where there has been a major incident	Date of birth of the involved pupil + 25 years (add to pupil file) – ALL permission slips for pupils on the trip need to be retained to show that the rules had been followed for all pupils

## Section B – Retention of Non-Pupil Data

### 13.0 Retention Schedule – Staff Records

13.1 The table below outlines the school’s retention periods for Staff Records.

13.2 This data is maintained by the Office Administrator, and must be securely disposed of and recorded in the Data Disposal Log upon the end of the retention period unless a valid reason is given to retain data longer than the retention period.

13.3 The Retention Schedule refers to series’ of records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.

13.4 ‘Staff Records’ Retention Schedule:

<b>13.4.1 Recruitment</b>	
Area Lead: Office Administrator	
Basic file description	Retention Period [Operational]
All unsuccessful attempts	Date of conclusion + 6 months.
Appointment of a Headteacher	Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse, then + 15 years, then review annually
Appointment of a member of staff/governor – unsuccessful candidates	Date of appointment + 6 months
Pre-employment vetting information – DBS Checks – successful candidates	Duration of employment + 6 years
Forms of proof of identity collected as part of the process of checking “portable” enhanced DBS disclosure	6 months - if necessary, copies will be retained in staff personnel files
Pre-employment vetting information – Evidence proving the right to work in the UK – successful candidates	Where possible these documents should be added to the staff personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment + not less than 2 years

<b>13.4.2 Operational Staff Management</b>	
Area Lead: Office Administrator	
Basic file description	Retention Period [Operational]
Staff personnel file	Duration of employment + 6 years unless there is an ongoing investigation.
Annual appraisal/assessment records	Current academic year + 6 years
Sickness absence monitoring	<ul style="list-style-type: none"> <li>- Unpaid: current academic year + 3 years is acceptable</li> <li>- Paid: becomes a financial record; current academic year + 6 years</li> </ul>



### 13.4.2 Operational Staff Management

Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
Staff training – where the training leads to continuing professional development	Length of time required by the Professional Body
Staff training – except where dealing with children, e.g. first aid or health and safety	Retained on the staff personnel file
Staff training – where the training relates to children (e.g. safeguarding or other child related training)	Date of the training + 40 years unless there is an ongoing investigation.

### 13.4.3 Disciplinary and Grievance Processes

Area Lead: Office Administrator

Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the BBCET.

Basic file description	Retention Period [Operational]
Records relating to any allegation of a child protection nature against a member of staff	Until the person's normal retirement age or 10 years from the date of the allegation (whichever is the longer) then REVIEW. Note: allegations that are found to be malicious should be removed from personnel files. If found, they are to be kept on the file and a copy provided to the person concerned, unless there is an ongoing investigation.
Oral warning	Date of warning + 6 months
Written warning - level 1	Date of warning + 6 months
Written warning - level 2	Date of warning + 12 months
Final warning	Date of warning + 18 months
Case not found	If the incident is related to child protection, review at the conclusion of the case
Absence record	Current academic year + 3 years

### 14.0 Retention Schedule – School Management

- 14.1 The table below outlines the school's retention periods for School Management.
- 14.2 This data is maintained by the Office Administrator or the Headteacher/SLT, and must be securely disposed of and recorded in the Data Disposal Log upon the end of the retention period unless a valid reason is given to retain data longer than the retention period.
- 14.3 The Retention Schedule refers to series' of records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.

#### 14.4 'School Management' Retention Schedule:

##### 14.4.1 Administrative Records and Reports, Correspondence, and Development Information

Area Lead: Headteacher/SLT

Basic file description	Retention Period [Operational]
Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	Date of the meeting + 3 years, then review annually
Reports created by the Headteacher or the Management Team	Date of the report + 3 years, then review annually
Records created by Headteachers, deputy Headteachers, Heads of year and other members of staff with administrative responsibilities which do not fall under any other category	Current academic year + 6 years, then review annually
Correspondence created by Headteachers, deputy Headteachers, Heads of Year and other members of staff with administrative responsibilities	Current academic year + 3 years
Professional development plans	These should be retained on the individual's personnel record. If not, then termination of employment + 6 years
School development plans	Life of the plan + 3 years
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Current academic year + 6 years, then review annually

##### 14.4.2 Operational Administration

Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
Records relating to the creation and publication of the school brochure or prospectus	Current academic year + 3 years
Records relating to the creation and distribution of circulars to staff, parents, or pupils	Current academic year + 1 year
School/Trust Privacy Notice which is sent to parents as part of GDPR compliance	Until superseded + 6 years

Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings)	Whilst pupil is at the school, unless there is an ongoing investigation
Newsletters and other items with a short operational use	Current academic year + 1 year Schools may decide to archive one copy
Visitor management systems (including electronic systems, visitor books and signing-in sheets)	Last entry in the visitors book + 6 years (in case of claims by parents or pupils about various actions)
Walking bus registers	Date of register + 6 years
General operational administrative files which do not fit under any other category	Current academic year + 5 years, then review

#### 14.4.3 School Support Organisations/External Agencies

##### Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
Copies of day books (KS1/Nursery parent-teacher diary, etc.)	Current academic year + 2 years, then annual review
Reports for outside agencies - where the report has been included on the case file created by the outside agency	Whilst pupil is at the school
Referral forms	Whilst the referral is current
Contact data sheets	Current academic year, then review - if contact is no longer active, then destroy
Contact database entries	Current academic year, then review - if contact is no longer active, then destroy

#### 15.0 Retention Schedule – Governance

15.1 The table below outlines the school's retention periods for Governance.

15.2 This data is maintained by the Office Administrator or the Headteacher/SLT, and must be securely disposed of and recorded in the Data Disposal Log upon the end of the retention period unless a valid reason is given to retain data longer than the retention period.

15.3 The Retention Schedule refers to series' of records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.

15.4 'Governance' Retention Schedule:

##### 15.4.1 Management of Governing Committee

##### Area Lead: Office Administrator and Headteacher/SLT

Basic file description	Retention Period [Operational]
Instruments of government	For the life of the school
Trusts and endowments	For the life of the school

### 15.4.1 Management of Governing Committee

#### Area Lead: Office Administrator and Headteacher/SLT

Basic file description	Retention Period [Operational]
Records relating to the election of parent and staff governors not appointed by the governors	Date of election + 6 months
Records relating to the appointment of co-opted governors	Date of the end of term of office, except where there have been allegations concerning children; in this case, retain for 25 years
Records relating to the election of chair and vice chair	After recorded in meeting minutes
Scheme of delegation and terms of reference	As set out by BBCET - schools may wish to retain these records for reference purposes in case decisions need to be justified
Meetings schedule	Current academic year
Agendas – Chair/Headteacher copy	After recorded in meeting minutes
Minutes - Chair/Headteacher set (signed)	Date of the meeting + 10 years then review annually
Reports made to the governors' meeting which are referred to in the minutes	Date of the meeting + 10 years then review annually
Register of attendance at Full Governing Committee meetings	Date of last meeting in the book + 6 years
Papers relating to the management of the annual parents' meeting	End of academic year
Agendas - additional copies	Date of meeting
Records relating to Governor Monitoring Visits	Date of the visit + 3 years
Annual Reports required by the DfE	Date of report + 3 years
All records relating to the conversion of schools to Academy status	For the life of the organisation (BBCET)
Records relating to complaints made to and investigated by the Governing Committee or Headteacher	<ul style="list-style-type: none"> <li>- Major complaints: current academic year + 6 years</li> <li>- If negligence involved, then: current academic year + 15 years</li> <li>- If child protection or safeguarding issues are involved then:                             <ul style="list-style-type: none"> <li>if related to staff, upon the age of retirement + 10 years;</li> <li>if related to child, 25 years after birth</li> </ul> </li> </ul>

### 15.4.1 Management of Governing Committee

Area Lead: Office Administrator and Headteacher/SLT

Basic file description	Retention Period [Operational]
Correspondence sent and received by the governing Committee or Headteacher	Current academic year + 3 years
Action plans created and administered by the Governing Committee	Until superseded/whilst relevant
Policy documents created and administered by the Governing Committee	Until superseded – unless related to safeguarding, child protection or other pupil related issues (i.e., exclusion)

### 15.4.2 Governor Management

Area Lead: Office Administrator and Headteacher/SLT

Basic file description	Retention Period [Operational]
Records relating to the appointment of a clerk to the Governing Committee	Date appointment ceases + 6 years
Records relating to the terms of office of serving governors, including evidence of appointment	Date appointment ceases + 6 years
Records relating to governor declaration against disqualification criteria	Date appointment ceases + 6 years
Register of business interests	Date appointment ceases + 6 years
Governors Code of Conduct	This is expected to be a dynamic document; one copy of each version should be kept for the life of the organisation (BBCET)
Records relating to the induction programme for new governors	Date appointment ceases + 6 years
Records relating to DBS checks carried out on clerk and members of the Governing Committee	Date of DBS check + 6 months
Governor personnel files	Date appointment ceases + 6 years
Records relating to the training required and received by Governors	Date Governor steps down + 6 years

## 16.0 Retention Schedule – Estates

- 16.1 The table below outlines the school’s retention periods for Estates.
- 16.2 This data is maintained by the Office Administrator or the member of the SLT in charge of managing the site (this may be the Headteacher), and must be securely disposed of and recorded in the Data Disposal Log upon the end of the retention period unless a valid reason is given to retain data longer than the retention period.
- 16.3 The Retention Schedule refers to series’ of records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.
- 16.4 ‘Estates’ Retention Schedule:

16.4.1 Health and Safety	
Area Lead: Headteacher/SLT	
Basic file description	Retention Period [Operational]
Health and safety policy statements	Life of policy + 3 years
Health and safety risk assessments	Life of risk assessment + 3 years (move to accident report if applicable)
Accident reporting records relating to all individuals	The Accident Book – BI 510 - 3 years after last entry in the book
Records relating to any reportable death, injury, disease, or dangerous occurrence (RIDDOR). For more information, see: <a href="http://www.hse.gov.uk/RIDDOR/">http://www.hse.gov.uk/RIDDOR/</a>	Date of incident + 3 years (MOVE TO PERSONNEL FILE)
Control of Substances Hazardous to Health (COSHH)	Date of incident + 40 years
Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	Last action + 40 years
Process of monitoring of areas where employees and persons are likely to have come into contact with radiation. Maintenance records or controls, safety features and PPE Dose assessment and recording	Examination date + 2 years – ensure record includes the condition of the equipment at the time of the examination Until the person to whom the record relates has/would have attained the age of 75 years, but in any event for at least 30 years from when the record was made
Fire Precautions logbooks	Current academic year + 3 years

### 16.4.1 Health and Safety

Area Lead: Headteacher/SLT

Basic file description	Retention Period [Operational]
Health and safety file to show current state of building, including all alterations (wiring, plumbing, building works, etc.), to be passed on in the case of change of ownership	Pass to new owner on sale or transfer of building

### 16.4.2 Property Management

Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
Plans of property belonging to the school	Whilst the building belongs to the school - pass on to new owner if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease + 6 years
Records relating to the letting of school premises	Current financial year + 6 years
All records relating to the maintenance of the school carried out by contractors	Whilst the building belongs to the school - pass on to new owner if the building is leased or sold
All records relating to the maintenance of the school carried out by school employees, including maintenance logbooks	Whilst the building belongs to the school - pass on to new owner if the building is leased or sold

## 17.0 Retention Schedule – Financial Management

- 17.1 The table below outlines the school's retention periods for Financial Management.
- 17.2 The Trust Finance Team retains all financial data not listed in this section.
- 17.3 This data is maintained by the Office Administrator, and must be securely disposed of and recorded in the Data Disposal Log upon the end of the retention period unless a valid reason is given to retain data longer than the retention period.
- 17.4 The Retention Schedule refers to series' of records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.

17.5 'Financial Management' Retention Schedule:

**17.5.1 Risk Management and Insurance**

**Area Lead: Office Administrator**

Basic file description	Retention Period [Operational]
Employer's Liability Insurance Certificate (in the event of a school closure)	Closure of the school + 40 years

**17.5.2 Asset Management**

**Area Lead: Office Administrator/SLT**

Basic file description	Retention Period [Operational]
Inventories of IT equipment, e.g., computers, laptops, projectors, smart phones and tablets (where applicable)	Current academic year + 6 years
Burglary, theft, and vandalism report forms	Current academic year + 6 years

**17.5.3 Accounts and Statements**

**Area Lead: Office Administrator**

Basic file description	Retention Period [Operational]
Grants managed by the school	Date of last payment on the loan + 12 years then review & ensure copies are retained by the Trust Finance Team
All records relating to the creation and management of budgets, including the annual budget statement and background papers	Ensure copies are retained by the Trust Finance Team only
Invoices	Ensure copies are retained by the Trust Finance Team only
Receipts and requisitions	Current academic year + 6 years & ensure copies are retained by the Trust Finance Team
Delivery notices	Current academic year + 6 years
Records relating to the collection and banking of monies	Current academic year + 6 years
Records relating to the identification and collection of parent/pupil-related debt	Final payment of debt + 6 years
Records relating to the identification and collection of company debt	Ensure copies are retained by the Trust Finance Team only



#### 17.5.4 Pupil records

Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
Student Grant applications	Ensure copies are retained by the Trust Finance Team only
Pupil Premium Fund records	Ensure copies are retained by the Trust Finance Team only

#### 17.5.5 Staff Payroll Information (Where retained at school-level for a valid reason)

Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
Overtime	Current academic year + 3 years
Payroll awards	Current academic year + 6 years
Payroll reports	Ensure copies are retained by the Trust Finance Team only
Sickness records	Current academic year + 3 years
Staff starters and leavers records	Current academic year + 3 years

#### 17.5.6 Contract Management

Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
All records relating to the management of contracts under signature < £10,000	Last payment on the contract + 6 years
All records relating to the management of contracts under signature > £10,000	Must be signed by the Trust COO (please see the Scheme of Delegation), retained from the last payment on the contract + 6 years & ensure copies are retained by the Trust Finance Team
Records relating to the monitoring of contracts	Life of contract + 6 or 12 years

#### 17.5.7 School Meals Management

Area Lead: Office Administrator

Basic file description	Retention Period [Operational]
Free school meals registers (where the register is used as a basis for funding)	Current academic year + 6 years
School meals registers	Current academic year + 3 years
School meals summary sheets	Current academic year + 3 years

### 18.0 Retention Schedule – Central Government, Academy Trust and Local Authority (LA) Data

18.1 The table below outlines the school's retention periods for Central Government, Academy Trust and Local Authority (LA) Data.

18.2 This data is maintained by the Office Administrator, and must be securely disposed of and recorded in the Data Disposal Log upon the end of the retention period unless a valid reason is given to retain data longer than the retention period.

18.3 The Retention Schedule refers to series' of records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.

18.4 'Central Government, Academy Trust and Local Authority (LA) Data' Retention Schedule:

<b>18.4.1 Local Authority</b>	
<b>Area Lead: Office Administrator</b>	
Basic file description	Retention Period [Operational]
Secondary Transfer Sheets (primary)	Current academic year + 2 years
Attendance returns	Current academic year + 1 year
School census returns	Current academic year + 5 years
Circulars and other information sent from the local authority	Operational use

<b>18.4.2 Central Government</b>	
<b>Area Lead: Office Administrator</b>	
Basic file description	Retention Period [Operational]
Ofsted reports and papers where a physical copy is held	Life of the report then review
Returns made to central government	Current academic year + 6 years
Circulars and other information sent from central government	Operational use, delete when superseded

## **19.0 Monitoring and review**

19.1 This policy will be reviewed by the Trust DPL and Trustees every 3 years in conjunction with the executive.

19.2 Any changes made to this policy will be communicated to all employees and LGCs.

## **Annex 1 Digital Continuity Statement (DCS)**

A digital continuity statement (DCS) outlines why the Bishop Bewick Catholic Education Trust intends to retain data that should be kept for six or more years.

The ability to properly manage digital data is essential for protecting the information that the Trust depends on to function. Correctly managed data allows the Trust to operate legally, efficiently and effectively.

The Bishop Bewick Catholic Education Trust will manage their information as an asset, ensuring that it is sourced and managed for as long as required. It is important that data remains accessible yet secure, so that it is available to use, when necessary, in the future, i.e., if legal charges are ever brought against the Trust.

Records deemed appropriate for the DCS should be identified early in their lifecycle, so the appropriate measures can be taken. Similarly, data that does not require inclusion in the DCS should also be identified early on, to avoid retaining excess data.

### ***The purpose and requirements for keeping the data:***

The Bishop Bewick Catholic Education Trust is committed to the protection and security of all data it is required to keep – in some cases this may be beyond a pupil's, staff member's or governor's tenancy within the Trust. In light of this, the Trust has developed a digital continuity statement pertaining to computerised data that needs to be kept for six or more years.

Should the Trust fail to retain this data, legal action may result. For this reason the Trust will retain relevant data for as long as it is required.

### ***The information assets to be covered by the statement:***

The Bishop Bewick Catholic Education Trust understands the sensitivity of some data it is required to keep and ensures measures are in place to secure this data, in accordance with the Trust's Data Protection Policy and the UK GDPR.

The Trust's data security measures are outlined in full, in both the Data Protection Policy and Retention policies (pupil and general).

### ***The individuals responsible for the data preservation:***

Data retention will be overseen by the following personnel: School and Trust Data Area Leads and DPL, DPO and the Trust's internal auditor.

Should any of the above change, appropriate updates will be made to this and other affected policies, i.e., the Retention policies, and correspondence will be made by the trust-level DPL.

The school-level DPL will specify the appropriate supported file formats for long-term preservation (post-6-years), and when they need to be transferred. For example, Microsoft Word, PowerPoint and Excel documents should be converted into PDF files, to ensure the longevity of their accessibility – file formats should be converted as soon as possible, to ensure their compatibility.

## **Annex 2 Data Disposal Log (DDL)**

All schools and the Trust are required to complete a Data Disposal Log which is updated by the designated Area Lead in charge of secure disposal and annually reviewed by the school or trust-level DPL. DDLs are to be held in an archive for a minimum of 5 years after review by the DPL.

The Bishop Bewick Catholic Education Trust does not operate an Information Asset Register. Instead, schools maintain a Data Disposal Log. Information on where all data is securely stored, who the designated area lead is, and retention periods, are specified in sections 11-18 of this policy.

A copy of the log is available upon request from the Communications and Compliance Officer.

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