

# Bishop Bewick Catholic Education Trust

<b>Policy Title:</b>	<b>Data Retention Policy</b>			
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<b>Approved by:</b>	<b>Trust Board</b>			
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# BBCET Data Retention Policy

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## 1.0 Context

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 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. 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.

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](mailto:dpo@chapmandis.co.uk)).

Each school must identify a DPL who will sign annually the Data Disposal Log (see Annex 1). In signing the log, the DPL is confirming that the designated Area Leads have ensured that the secure disposal of the relevant data in their remit has been carried out (i.e., records held by Senior Leadership, office administration, SEN[D] and safeguarding information). DPLs and Area Leads do not need to personally dispose of data (they may delegate this task), but they must ensure through sampling/checks, that this has been completed.

The Trust will randomly sample a school's data, following the submission of the Data Disposal Log (to [rachel.dawson@bishopbewickcet.org](mailto:rachel.dawson@bishopbewickcet.org) by 30<sup>th</sup> of September annually), to ensure compliance.

### **School**

1. DPL

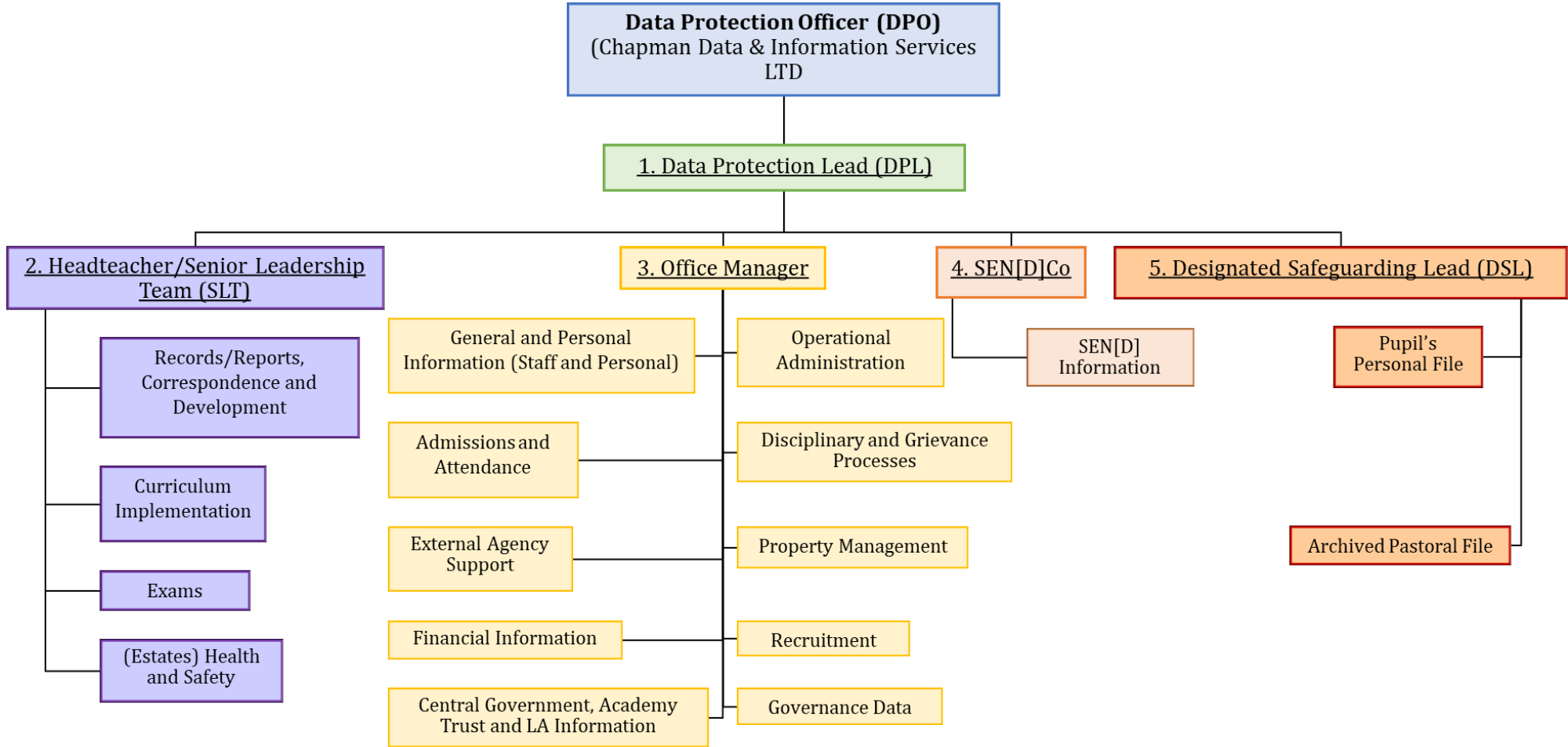
### Area Leads

2. Headteacher/Senior Leadership Team
3. Office Manager
4. SEN[D]Co
5. DSL

Figure 1 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).

Data retention provisions in this policy are derived from the [IRMs Toolkit 2019](#).

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.



## **2.0 Scope and purpose**

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.

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

## **4.0 Responsibilities**

4.1 All DPLs are responsible for continuity, and recovery measures are in place to ensure the security of protected data.

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

4.3 The Trust DPL is responsible for promoting compliance with this policy.

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

4.5 The school's Area Leads have the responsibility for overseeing the management and secure disposal of records in line with this policy. Leads must ensure the storage, assessment, and timely disposal of data in their remit.

4.6 All school staff 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 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 Schedules and Data Disposal Log**

The Retention Schedules in sections 11-18, are derived from the IRMS toolkit for schools (2019). 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).

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. Area Leads are expected to take account of this format and the retention periods when they are creating new record keeping systems.

The Trust's long-term aim is to ensure all records are held digitally.

## **6.0 Digital Data**

- 6.1 All digital data are coded, encrypted or password-protected/two-factor authenticated. These should only be stored online via Cloud services (e.g., Microsoft 365).
- 6.2 Digital data will be archived to dedicated files on the Cloud server, which are password-protected.
- 6.3 Removeable storage devices will never be used to store data.
- 6.4 DPLs will review the new and existing storage methods across the Trust annually.

## **7.0 Limiting risk and protecting personal data**

- 7.1 Under the GDPR, all individuals have the right to data minimisation and data protection by design and default – the school, as the data controller, will ensure that appropriate measures are in place for individuals to exercise this right.
- 7.2 Staff are provided with their own secure login and password and requires two-factor authentication.
- 7.3 Staff should avoid using full names of pupils and staff in emails (advised to use abbreviations/initials).
- 7.4 Emails containing highly 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.

- 7.5 Circular emails to parents are sent blind carbon copy (Bcc), so email addresses are not disclosed to other recipients.
- 7.6 Whenever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification.
- 7.7 All staff should note that an unauthorised disclosure may result in disciplinary action.
- 7.8 When data are required to be retained over time, the school removes any personal data, i.e., cohort-level (pupil only), and keeps only the data needed.

## **8.0 Storing information**

- 8.1 If confidential paper records are kept, these should be stored in a locked filing cabinet, drawer or safe with restricted access. These records should be made digital where possible.
- 8.2 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).
- 8.3 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.
- 8.4 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.
- 8.5 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.

## **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 30<sup>th</sup> of September each year, the DPL will approve all secure disposal procedures via the Data Disposal Log for the previous academic year.

## **10.0 Management of Pupil data**

10.1 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.



- 10.2 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.
- 10.3 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.
- 10.4 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.
- 10.5 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.
- 10.6 The school will ensure that no pupil records are altered or amended before transferring the Common Transfer File (CTF) to the next school that the pupil will attend.
- 10.7 The only exception of 10.6 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.
- 10.8 (Primary schools only) Upon transfer of the CTF, 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.
- 10.9 (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.
- 10.10 Schools will never send a pupil’s record by post, CTF only.

## 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 Manager, 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 records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.
- 11.4 ‘Pupil Data’ Retention Schedule:

Schedule A. Pupil Data	
Basic file description	Retention Period [Operational]
Annual School Admissions Policy	Archive for 3 years, then dispose
Successful admissions data	Date of admission + 1 year, then added to pupil file
Unsuccessful admissions data	1 year from date of application, or 1 year after appeal
Register of Admissions	Date of register + 3 years
In-year admissions – Secondary Schools	Current academic year + 1 year
Proofs of address and supplementary information form (religion, medical conditions etc.) supplied by parents	Current academic year + 1 year
Pupil’s Individual Educational Record required by The Education (Pupil Information) (England) Regulations 2005:	
Primary	Whilst pupil is at the school, then move to secondary school
Secondary	Date of birth of the pupil + 25 years (except SEN files, see *note below)
Child protection information (must only be held in the pupil file)	Keep until pupil is 25 years old (31 if pupil with SEN), or, if applicable, retain for duration of any formal investigation
Attendance Registers	Date of entry + 3 years
Correspondence relating to any absence (authorised or unauthorised)	Current academic year + 2 years
<b>*Special Educational Needs files</b> , 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 – <b>the retention period adds an additional 6 years</b> 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 Office Manager 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 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:

<b>Schedule B. Curriculum/Exams and Extra Curricular Activities Data</b>	
Basic file description	Retention Period [Operational]
Examination results (school’s copy)	Current academic year + 6 years
External 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
Internal moderation records	Current academic year + 1 year
External moderation records	Until superseded
Schemes of work	Current academic year + 1 year
Timetable	Current academic year + 1 year
Mark books	Current academic year + 1 year
Day books (nursery/KS1)	Current academic year + 2 years
Record of homework 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
Walking bus registers	Date of register + 6 years
Parental consent forms for <u>school trips where there has been no major incident</u>	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 <u>school trips – where there has been a major incident</u>	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

### 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 Manager, 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 records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.
- 13.4 ‘Staff Records’ Retention Schedule:

Schedule C. Staff records	
Basic file description	Retention Period [Operational]
Headteacher personnel file	From average age of retirement (67 years old) + 6 years, except in cases of negligence or claims of child abuse, then + 15 years from the date of the allegation (whichever is the longer), e.g., allegation at 65, retain until 80.
Staff personnel file (except Headteacher)	Duration of employment + 6 years, unless there is an ongoing investigation <b>(if relating to child protection allegation, see note**)</b>
<b>**Records relating to any allegation of a child protection nature against a member of staff</b>	From average age of retirement (67 years old) + 10 years from the date of the allegation (whichever is the longer), e.g., allegation at 65, retain until 75. 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.
All unsuccessful staff applications	Date of conclusion + 6 months.
All unsuccessful governor applications	Date of conclusion + 6 months
Pre-employment vetting information (i.e., enhanced DBS checks, right to work in the UK)	Duration of employment + 6 years
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
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.
Staff annual appraisal records	Current academic year + 6 years
Sickness absence monitoring	Current academic year + 6 years
Oral staff warning	Date of warning + 6 months
Written staff warning - level 1	Date of warning + 6 months
Written staff warning - level 2	Date of warning + 12 months
Final staff warning	Date of warning + 18 months
Staff allegation where case is not found/proven	If the incident is related to child protection, seek legal advice on period of retention

## 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 Manager 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 records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.
- 14.4 ‘School Management’ Retention Schedule:

<b>Schedule D. School Management Data</b>	
Basic file description	Retention Period [Operational]
School development plans	Life of the plan + 3 years
Records relating to the creation and publication of the school brochure or prospectus (e.g., permission to use photographs of pupils)	Current academic year + 3 years
Records relating to the creation and distribution of letters/circulars to staff, parents, or pupils	Current academic year + 3 year Schools may decide to archive one copy
Minutes of Senior Leadership Team meetings and records of any other minuted meetings (e.g., year teams/key stage/departmental meetings)	Date of the meeting + 3 years, then review annually
Reports created by the Headteacher or the Senior Leadership 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
Professional development plans	These should be retained on the staff individual personnel record. If not, then termination of employment + 6 years
Referral forms where no further action is required	Date of conclusion
Contact data (paper copies)	Current academic year (maximum), destroy if no longer required
Contact database entries	Current academic year, then review – destroy if no longer required
General operational administrative files which do not fit under any other category	Current academic year + 5 years, then review

## 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 Manager 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 records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.
- 15.4 ‘Governance’ Retention Schedule:

<b>Schedule E. Governance Records</b>	
Basic file description	Retention Period [Operational]
Terms of Reference for serving Local Governing Committee	For the life of the school
Any financial trusts or endowments	For the life of the school, then pass to BBCET
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
Records relating to the terms of office of serving governors, including evidence of appointment (including chair and vice chair)	Date appointment ceases + 6 years
Records relating to governor declaration against disqualification criteria	Date appointment ceases + 6 years
Records relating to the election of all governors (including chair and vice chair)	After recorded in meeting minutes
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 governors (including co-opted)	Term of office, except where there have been allegations concerning children; in this case, retain for 25 years
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
Agendas - additional copies	Date of meeting
Records relating to Governor Monitoring Visits (e.g., safeguarding)	Date of the visit + 3 years

### Schedule E. Governance Records

Basic file description	Retention Period [Operational]
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>
Policy documents approved by the Governing Committee	Until superseded – unless related to safeguarding, child protection or other pupil related issues (i.e., exclusion)
Records relating to governor checks (i.e., against disqualification criteria, DBS), and their personnel file	Duration of post + 6 years
Register of business interests	Duration of post + 6 years

## 16.0 Retention Schedule – Estates, Health and Safety

- 16.1 The table below outlines the school’s retention periods for Estates.
- 16.2 This data is maintained by the Office Manager 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 records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.
- 16.4 ‘Estates’ Retention Schedule:

<b>Schedule F. Estates, Health and Safety Records</b>	
Basic file description	Retention Period [Operational]
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
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



## 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 Manager, 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 records regardless of the media (i.e., paper, electronic, photographic, etc.) in or on which they are stored.
- 17.5 ‘Financial Management’ Retention Schedule:

<b>Schedule G. Financial Management</b>	
Basic file description	Retention Period [Operational]
Employer’s Liability Insurance Certificate (in the event of a school closure)	Closure of the school + 40 years
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
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
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
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

**Schedule G. Financial Management**

Basic file description	Retention Period [Operational]
Staff starters and leavers records	Current academic year + 3 years
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
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 Manager, 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 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>Schedule H. Central Government, Academy Trust and Local Authority (LA) Data</b>	
<b>Basic file description</b>	<b>Retention Period [Operational]</b>
Secondary Transfer Sheets (primary)	Current academic year + 2 years
Attendance returns	Current academic year + 1 year
School census returns	Current academic year + 5 years
Returns made to central government	Current academic year + 6 years

## **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 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.

Schools will be sent a copy of the log from the Communications and Compliance Officer. This should then be maintained by the school indefinitely.