



## **Data Retention Guidance**

### **Action for Summer 2024**

This document outlines the implementation of the BBCET Data Retention Policy for the first data disposal exercise (30<sup>th</sup> June-30<sup>th</sup> Sept. 2024).

The aim of this guidance is to provide some consistency of practice in the way in which records are retained across our schools, and most importantly to reduce the volume of records stored in schools.

The benefits of the policy:

- Schools can be confident in the disposal of old records;
- Schools can avoid unnecessary duplication of records;
- Time-saving in the long-term through members of staff assigned to the management of key areas;
- Reduces the possibility of an information security breach;
- It supports accountability and transparency, which is increasingly important under GDPR requirements;
- Allows us to move to digital-based data.

#### **Action 1: Assign/confirm roles (by Headteacher)**

##### **1a) Data Protection Lead**

Heads should assign a member of staff to be the school's 'Data Protection Lead' (DPL).

The DPL must ensure they are familiar with the BBCET Data Retention Policy. The DPL will oversee allocated 'Area Leads' across the school.

Please note: the Data Protection Lead may also be a lead in other areas, e.g. the DPL may also be an Area Lead for office administration information.

##### **1b) Area Leads**

Assign at least one member of staff in the key areas of the school in which data retention decisions will be required. The broad data areas are:

- Any information retained within Senior Leadership activity
- Office Administration information
- SEN(D) information
- Safeguarding information

Please note: staff members can be assigned to multiple areas, e.g., a member of Senior Leadership is likely to be responsible for decisions to retain curriculum information, but may also lead on safeguarding retention decisions.



## Action 2: Secure disposal of school data (by Area Leads and DPLs)

**Data Disposal Log (DDL):** Schools may begin to dispose of data earlier than the start of first annual exercise (30<sup>th</sup> June-30<sup>th</sup> Sept 2024). A log must be kept as soon as formal data disposal begins. In year 1 (2024), schools may review, but are not expected to consider, ALL Retention Schedules (11-18 of the Retention Policy).

However, for 2024, the following Retention Schedules are required to have been reviewed:

**Schedule A (section 11 of policy):** Student Educational Files of pupils over 25 years old (unless of safeguarding reasons)

**Schedule C (section 13 of policy):** Staff personnel files (including scanning of employment contracts, see Action 3 below)

**Schedule G (section 17 of policy):** Financial Documents

## Action 3: Scanning staff personnel files

**3a) Remove any unnecessary documents in staff personnel files** (e.g., old applications), as per GDPR.

**3b) Scan the most recent staff employment contract and send to the Trust HR Lead ([joanne.smith@bbcet.org](mailto:joanne.smith@bbcet.org)).**

The purpose of this action is to ensure that BBCET complies and has a contract for every employee.

**Please notify [joanne.smith@bbcet.org](mailto:joanne.smith@bbcet.org) if there are any missing contracts, so the Trust can resolve this and reissue if necessary.**

**3c) Scan all remaining personnel file documents.**

Please do not attach the contract to other files in staff personnel file (e.g., schools may want to file all staff documents to one pdf – this is fine, but always keep the contract and other documents which may contain sensitive information separate).

Hard copies of all staff personnel file documents can be retained at this stage. We aim to go paperless from September 2027; the intention of this work is to reduce the workload ahead of this date.