

Breakthrough Transformation Trust

Record Retention Schedule

Version 2.0

Approved by Debbie Dugdall, CEO

Date July 2020

This document has been created in line with the guidance set out in the DfE Data Protection: Toolkit

1. Management of the Trust

This section contains retention periods connected to the general management of the school. This covers the work of the Trustees, the CEO and the senior management team, the admissions process and operational administration.

1.1 Trustees				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Agendas for Trustees meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff	One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL ¹
	Minutes of Trustees meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		
	- Principal Set (signed)		PERMANENT	
	- Inspection Copies ²		Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.
	Reports presented to the Trustees	There may be data protection issues if the report deals with confidential issues relating to staff	Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently	SECURE DISPOSAL or retain with the signed set of the minutes
	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL

¹ In this context SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross cut shredder.

² These are the copies which the clerk to the Governor may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.1 Trustees (continued...)

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Action plans created and administered by the Trust	No	Life of the action plan + 3 years	SECURE DISPOSAL
	Policy documents created and administered by the Trust	No	Life of the policy + 3 years	SECURE DISPOSAL
	Records relating to complaints dealt with by the Trust	Yes	Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
	Annual Reports	No	Date of report + 10 years	SECURE DISPOSAL
	Proposals concerning the change of status of a Trust College	No	Date proposal accepted or declined + 3 years	SECURE DISPOSAL

1.2 CEO and Senior Management Team

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff	Date of the meeting + 3 years then review	SECURE DISPOSAL
	Reports created by the CEO or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff	Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
	Records created by the CEO, Directors, SMT and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff	Current academic year + 6 years then review	SECURE DISPOSAL
	Correspondence created by the CEO, Directors, SMT and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff	Date of correspondence + 3 years then review	SECURE DISPOSAL
	Professional Development Plans	Yes	Life of the plan + 6 years	SECURE DISPOSAL
	Trust Development Plans	No	Life of the plan + 3 years	SECURE DISPOSAL

1.3 Admissions Process				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	All records relating to the creation and implementation of the Trusts Admissions' Policy	No	Life of the policy + 3 years then review	SECURE DISPOSAL
	Admissions – if the admission is successful	Yes	Date of admission + 1 year	SECURE DISPOSAL
	Admissions – if the appeal is unsuccessful	Yes	Resolution of case + 1 year	SECURE DISPOSAL
	Register of Admissions	Yes	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made.	REVIEW The Trust may wish to consider keeping the admission register permanently as we could receive enquiries from past pupils to confirm the dates they attended the Trust.
	Proofs of address supplied by parents as part of the admissions process	Yes	Current year + 1 year	SECURE DISPOSAL
	Supplementary Information form including additional information such as religion, medical conditions etc	Yes		
	- For successful admissions		This information should be added to the pupil file	SECURE DISPOSAL
	- For unsuccessful admissions		Until appeals process completed	SECURE DISPOSAL

1.4 Operational Administration

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	General file series	No	Current year + 5 years then REVIEW	SECURE DISPOSAL
	Records relating to the creation and publication of the Trusts brochure or prospectus	No	Current year + 3 years	STANDARD DISPOSAL
	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Current year + 1 year	STANDARD DISPOSAL
	Newsletters and other items with a short operational use	No	Current year + 1 year	STANDARD DISPOSAL
	Visitors' Books and Signing in Sheets	Yes	Current year + 6 years then REVIEW	SECURE DISPOSAL

2. Human Resources

This section deals with all matters of Human Resources management within the school.

2.1 Recruitment				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	All records leading up to the appointment of a new Head of Centre	Yes	Date of appointment + 6 years	SECURE DISPOSAL
	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes	Date of appointment of successful candidate + 6 months	SECURE DISPOSAL
	All records leading up to the appointment of a new member of staff – successful candidate	Yes	All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months	SECURE DISPOSAL
	Pre-employment vetting information – DBS Checks	No	The Trust does not have to keep copies of DBS certificates. If the Trust does so the copy must NOT be retained for more than 6 months	SECURE DISPOSAL (if retained)
	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes	Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file	SECURE DISPOSAL (if retained)
	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom	Yes	Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	SECURE DISPOSAL

2.2 Operational Staff Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Staff Personal File	Yes	Termination of Employment + 6 years	SECURE DISPOSAL
	Timesheets	Yes	Current year + 6 years	SECURE DISPOSAL
	Annual appraisal/ assessment records	Yes	Current year + 5 years	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	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	SECURE DISPOSAL These records must be shredded
	Disciplinary Proceedings	Yes		
	- verbal warning		Date of warning + 3 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]
	- written warning		Date of warning + 6 months	SECURE DISPOSAL
	- final written warning		Date of warning + 12 months	SECURE DISPOSAL
	- case not found		If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

2.4 Health and Safety

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Health and Safety Policy Statements	No	Life of policy + 3 years	SECURE DISPOSAL
	Health and Safety Risk Assessments	No	Life of risk assessment + 3 years	SECURE DISPOSAL
	Records relating to accident/ injury at work	Yes	Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
	Accident Reporting	Yes		SECURE DISPOSAL
	- Adults		Date of the incident + 6 years	SECURE DISPOSAL
	- Children		DOB of the child + 25 years	SECURE DISPOSAL
	Control of Substances Hazardous to Health (COSHH)	No	Current year + 40 years	SECURE DISPOSAL
	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Last action + 40 years	SECURE DISPOSAL
	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No	Last action + 50 years	SECURE DISPOSAL
	Fire Precautions log books	No	Current year + 6 years	SECURE DISPOSAL

2.5 Payroll and Pensions

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Maternity pay records	Yes	Current year + 3 years	SECURE DISPOSAL
	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	Current year + 6 years	SECURE DISPOSAL

3. Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals

3.1 Risk Management and Insurance

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Employer's Liability Insurance Certificate	No	Closure of the Trust + 40 years	SECURE DISPOSAL

3.2 Asset Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Inventories of furniture and equipment	No	Current year + 6 years	SECURE DISPOSAL
	Burglary, theft and vandalism report forms	No	Current year + 6 years	SECURE DISPOSAL

3.3 Accounts and Statements including Budget Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Annual Accounts	No	Current year + 6 years	Standard disposal
	Loans and grants managed by the Trust	No	Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL
	Student Grant applications	Yes	Current year + 3 years	SECURE DISPOSAL
	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No	Life of the budget + 3 years	SECURE DISPOSAL
	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years	SECURE DISPOSAL
	Records relating to the collection and banking of monies	No	Current financial year + 6 years	SECURE DISPOSAL
	Records relating to the identification and collection of debt	No	Current financial year + 6 years	SECURE DISPOSAL

3.4 Contract Management

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years	SECURE DISPOSAL
	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years	SECURE DISPOSAL
	Records relating to the monitoring of contracts	No	Current year + 2 years	SECURE DISPOSAL

3.5 Petty Cash

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Petty cash - Paying in and out books	No	Current year + 6 years	SECURE DISPOSAL
	Petty cash – Ledger	No	Current year + 6 years	SECURE DISPOSAL
	Petty cash – Invoices	No	Current year + 6 years	SECURE DISPOSAL
	Petty cash – Receipts	No	Current year + 6 years	SECURE DISPOSAL
	Petty cash - Bank statements	No	Current year + 6 years	SECURE DISPOSAL

3.6 Student Dinners

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Free School Meals Registers	Yes	Current year + 6 years	SECURE DISPOSAL
	Student Dinner Registers	Yes	Current year + 3 years	SECURE DISPOSAL
	Student Meals Summary Sheets	No	Current year + 3 years	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

4.1 Property Management				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Title deeds of properties belonging to the Trust	No	PERMANENT These should follow the property unless the property has been registered with the Land Registry	
	Plans of property belong to the Trust	No	These should be retained whilst the building belongs to the Trust and should be passed onto any new owners if the building is leased or sold.	
	Leases of property leased by or to the Trust	No	Expiry of lease + 6 years	SECURE DISPOSAL

4.2 Maintenance				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	All records relating to the maintenance of the Trust carried out by contractors	No	Current year + 6 years	SECURE DISPOSAL
	All records relating to the maintenance of the Trust carried out by Trust employees including maintenance log books	No	Current year + 6 years	SECURE DISPOSAL

4 Pupil Management

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting see under Health and Safety above

5.1 Pupil's Educational Record				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes		
	- Primary		Retain whilst the child remains at the Trust	The file should follow the pupil when he/she leaves the Trust
	- Secondary		Date of Birth of the pupil + 25 years	SECURE DISPOSAL
	Examination Results – Pupil Copies	Yes		
	- Public		This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
	- Internal		This information should be added to the pupil file	
	Child Protection information held on pupil file		If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	SECURE DISPOSAL – these records MUST be shredded
	Child protection information held in separate files		DOB of the child + 25 years then review. This retention period has been determined on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL – these records MUST be shredded

5.2 Attendance				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Attendance Registers	Yes	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL
	Correspondence relating to authorized absence		Current academic year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Special Educational Needs files, reviews and Individual Education Plans	Yes	Date of Birth of the pupil + 25 years	SECURE DISPOSAL NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.
	Statement / EHCP maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file]	SECURE DISPOSAL unless the document is subject to a legal hold

6. Curriculum Management

6.1 Implementation of Curriculum				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Schemes of Work	No	Current year + 1 year	Review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
	Timetable	No	Current year + 1 year	Standard disposal
	Mark Books	No	Current year + 1 year	Standard disposal
	Record homework set	No	Current year + 1 year	Standard disposal
	Pupils' Work	No	Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the Trust's policy then current year + 1 year	SECURE DISPOSAL

7. Extra Curriculum Management

7.1 Educational Visits outside the Classroom				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Records created by the Trust to obtain approval to run an Educational Visit outside the Classroom – Primary Children	No	Date of visit + 14 years	SECURE DISPOSAL
	Records created by the Trust to obtain approval to run an Educational Visit outside the Classroom – Secondary Children	No	Date of visit + 10 years	SECURE DISPOSAL
	Parental consent forms for trips where there has been no major incident	Yes	Conclusion of the trip. Although the consent forms could be retained for DOB + 22 years	SECURE DISPOSAL
	Parental permission slips for trips – where there has been a major incident	Yes	DOB of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	SECURE DISPOSAL

7.2 Taxi Details

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Taxi / Transport details	Yes	3 years This takes into account the fact that if there is an incident requiring an accident report the details will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]

7.3 Student and Family Services

Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Home School Books	Yes	Current year + 2 years then review	SECURE DISPOSAL
	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes	Whilst child is attending and then destroy	SECURE DISPOSAL
	Referral forms	Yes	While the referral is current	SECURE DISPOSAL
	Contact data sheets	Yes	Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL

8. Central Government and Local Authority

8.1 Central Government				
Ref	Basic file description	Data Protection Issues	Retention Period [Operational]	Action at the end of the administrative life of the record
	Audit reports and papers	No	Life of the report then REVIEW	SECURE DISPOSAL
	Returns made to central government	No	Current year + 6 years	SECURE DISPOSAL
	Circulars and other information sent from central government	No	Operational use	SECURE DISPOSAL

Comments or queries regarding the retention of school records should be addressed to the school at:

Charlie Warne Data Protection Lead Officer

Email: charlie.warne@tborg.org