



Data Retention Policy

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| Date of Review Reviewed By Date of Next Review | January 2025 Kath Barclay March 2026 |
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Bridge the Gap Malvern Limited (BTGM) has a responsibility to maintain its records and record keeping systems. When doing this, we will take account of the following factors: -

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Their accessibility.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect current practice, the requirements of current legislation and best practice and guidance. It may be amended from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. We may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Data Protection

This policy sets out how long employment-related and student data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (GDPR) and the Freedom of Information Act 2000. Data will be stored and processed to allow for the efficient operation of the centre. The Data Protection Policy outlines its duties and obligations under the GDPR.

Retention Schedule (Appendix A)

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, BTGM will adhere to the standard retention times listed within that schedule.

Paper records will be regularly monitored by BTGM Directors.

Electronic records will be regularly monitored by BTGM Directors.



The schedule is a relatively lengthy document listing the many types of records used by BTGM and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

Destruction of Records

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information, or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate wastepaper merchant. All electronic information will be deleted.

BTGM maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least:

- File reference (or another unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising person
- Date destroyed or deleted from system; and
- Person(s) who undertook destruction.

Retention of Safeguarding Records

Any allegations made that are found to be malicious must not be part of the personnel records. For any other allegations made, BTGM must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused. Any allegations made of sexual abuse should be preserved by BTGM for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. Guidance from the Independent Inquiry Child Sexual Abuse states that prolonged retention of personal data at the request of an Inquiry would not contravene data protection regulation provided the information is restricted to that necessary to fulfil potential legal duties that a School may have in relation to an Inquiry. Whilst the Independent Inquiry into Child Sexual Abuse is ongoing, it is an offence to destroy any records relating to it. At the conclusion of the Inquiry, it is



likely that an indication regarding the appropriate retention periods of the records will be made.

Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by Centre Administrator, who, when archiving documents should record in this list the following information:

- File reference (or another unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising person.

Transferring Information to other Media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

Transferring Information to Sending School

For students who are on roll with a school and their programme is being provided by BTGM we will retain the student's educational and safeguarding records for the duration of the programme. Once a student leaves the file should be sent to their sending school. The responsibility for retention then shifts to the sending school. We retain the file for a year following transfer in case any issues arise as a result of the transfer. We may delay destruction for a further period where there are special factors such as potential litigation.

Responsibility and Monitoring

The Head of Centre has primary and day-to-day responsibility for implementing this Policy. The Data Protection Officer, in conjunction with the Head of Centre is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The data protection officer will consider the suitability and adequacy of this policy and report improvements directly to management team.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records. Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this Policy and are given adequate and regular training on it.



Emails

Email accounts are not a case management tool. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a student record). It is important to note that the retention period will depend on the content of the email, and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.



Appendix A

Retention Schedule

| File Description | Retention Period |
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| Employment Records | |
| Job applications and interview records of unsuccessful candidates | Six months after notifying unsuccessful candidates, unless the centre has applicants' consent to keep their CVs for future reference. In this case, application forms will give applicants the opportunity to object to their details being retained |
| Job applications and interview records of successful candidates | 6 years after employment ceases |
| Written particulars of employment, contracts of employment and changes to terms and conditions | 6 years after employment ceases |
| Right to work documentation including identification documents | 6 years after employment ceases |
| Immigration checks | 6 years after employment ceases |
| DBS checks and disclosures of criminal records forms | As soon as practicable after the check has been completed and the outcome recorded (i.e. whether it is satisfactory or not) unless in exceptional circumstances (for example to allow for consideration and resolution of any disputes or complaints) in which case, for no longer than 6 months |
| Change of personal details notifications | No longer than 6 months after receiving this notification |
| Emergency contact details | Destroyed on termination |
| Annual leave records | Six years after the end of tax year they relate to or possibly longer if leave can be carried over from year to year |
| Consents for the processing of personal and sensitive data | For as long as the data is being processed and up to 6 years afterwards |
| Working Time Regulations: • Opt out forms • Records of compliance with WTR | <ul style="list-style-type: none"> • Two years from the date on which they were entered into • Two years after the relevant period |
| Disciplinary records | 6 years after employment ceases |
| Training | 6 years after employment ceases or length of time required by the professional body |
| Staff training where it relates to safeguarding or other child related training | Date of the training plus 40 years (This retention period reflects that the IICSA may wish to see training records as part of an investigation) |



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| Annual appraisal/assessment records | Current year plus 6 years |
| Professional Development Plans | 6 years from the life of the plan |
| Allegations of a child protection nature against a member of staff including where the allegation is founded | 10 years from the date of the allegation or the person's normal retirement age (whichever is longer). This should be kept under review. Malicious allegations should be removed. |
| Financial and Payroll Records | |
| Pension records | 12 Years |
| Retirement benefits schemes - notifiable events (for example, relating to incapacity) | 6 years from the end of the scheme year in which the event took place |
| Payroll and wage records | 6 years after end of tax year they relate to (Taxes Management Act 1970; Income and Corporation Taxes 1988) |
| Maternity/Adoption/Paternity Leave records | 3 years after end of tax year they relate to |
| Statutory Sick Pay | 3 years after the end of the tax year they relate to |
| Current bank details | Until updated plus 3 years |
| Time sheets/clock cards/flexitime | Current year plus 3 years |
| Pupil Premium Fund records | Date pupil leaves the provision plus 6 years |
| National Insurance (schedule of payments) | Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988) |
| Insurance | Current year plus 6 years (Taxes Management Act 1970; Income and Corporation Taxes 1988) |
| Overtime | Current year plus 3 years (Taxes Management Act 1970; Income and Corporation Taxes 1988) |
| Annual accounts | Current year plus 6 years |
| Loans and grants managed by BTGM | Date of last payment on the loan plus 12 years |
| All records relating to the creation and management of budgets | Life of the budget plus 3 years |
| Invoices, receipts, and requisitions | Current financial year plus 6 years |
| Agreements and Administration Paperwork | |
| Collective workforce agreements and past agreements that could affect present employees | Permanently |
| Development Plans | 3 years from the life of the plan |
| Visitors book and signing in sheets | 6 years |
| Newsletters and circulars to staff, parents and students | 1 Year (we may decide to archive one copy) |



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| Minutes of Management Team Meetings | Date of meeting plus 3 years or as required |
| Reports created by the Head of Centre and Management Team | Date of report plus a minimum of 3 years or as required |
| Health & Safety Records | |
| Health and Safety consultations | Permanently |
| Health & Safety Risk Assessments | Life of the risk assessment plus 3 years |
| Health and Safety Policy Statements | Life of policy plus 3 years |
| Any records relating to any reportable death, injury, disease or dangerous occurrence | Date of incident plus 3 years provided that all records relating to the incident are held on personnel file |
| Accident reporting records relating to individuals who are under 18 years of age at the time of the incident | Until the student reaches the age of 21. |
| Accident reporting records relating to individuals who are over 18 years of age at the time of the incident | Accident book should be retained 3 years after last entry in the book. (Social Security (Claims and Payments) Regulations 1979; Social Security Administration Act 1992; Limitation Act 1980) |
| Fire precaution log books | Current year plus 3 years |
| Medical records and details of: - • control of lead at work • employees exposed to asbestos dust • records specified by the Control of Substances Hazardous to Health Regulations (COSHH) | 40 years from the date of the last entry made in the record (Control of Substances Hazardous to Health Regulations (COSHH); Control of Asbestos at Work Regulations) |
| Records of tests and examinations of control systems and protection equipment under COSHH | 5 years from the date on which the record was made |
| Student Records | |
| Admissions Register | Entries to be preserved for three years from date of entry |
| Attendance Registers | 3 years from the date of entry |
| Correspondence relating to any absence (authorised or unauthorised) | Current academic year plus 2 years (Education Act 1996) |
| 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 plus 31 years (Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan). (Children and Family’s Act 2014; Special Educational Needs and Disability Act 2001) |
| Student medical records and reports | Current plus 3 years |
| Student social services reports and report | Current plus 3 years |



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| Child protection information (to be held in a separate file). | DOB of the student plus 25 years then review Note: These records will be subject to any instruction given by IICSA |
| Exclusion/Behavioural | Until student reaches 31 years old |
| Exam results (student copy) | 1-3 years from the date the results are released |
| Examination results (BTGM's copy) | Current year plus 6 years |
| Records relating to any allegation of a child protection nature against a member of staff | Until the accused normal retirement age or 10 years from the date of the allegation (whichever is the longer) |
| Consents relating to BTGM activities as part of UK GDPR compliance (for example, consent to be sent circulars or mailings) | Consent will last whilst the pupil attends |
| Student's work | Current plus 1 year. Where possible, returned to student at the end of their programme. Otherwise, the work should be retained for 1 year. |
| Timetables | Current year plus 1 year |
| Photographs of students | For the time the student's programme and for a short while after. Please note select images may also be kept for longer (for example to illustrate history of BTGM) |
| Consent forms for BTGM trips where there has been no major incident | End of the trip or end of the academic year (subject to a risk assessment carried out by BTGM) |
| Work experience records | Current and for 2 years after |
| Other records | |
| Emails | As needed |
| Privacy notices | Until replaced plus 6 years |
| All records relating to maintenance of the building carried out by contractors or employees | Whilst the building is leased to the company |
| Contact data sheets | Current year then review, if contact is no longer required, then destroy. |

BTGM reviews this policy annually. However, we may review the policy earlier than this if the Government introduces new regulations, or if we receive recommendations on how the policy might be improved. This document is also available in other formats e.g. e-mail and enlarged print version, on request to the office and is displayed on our website.