Policy Information Sheet

Name of Policy:	**Data Retention Policy**
Delegated Authority	☐ Trust Board ☒ Nominated Committee - Audit and Risk ☐ CEO ☒ CFO ☐Other _____
Policy review cycle	☐ Annual ☒ 3 years ☐ 4 years ☐ 5 years ☐ Other – In line with Durham HR updates
Statutory policy	☐ Yes ☒ No
Published online	☐ Statutory ☐ Trust recommended ☒ No

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Version	Author	Revisions	Final approval date
2	CFO	Updated to TB responsibility annually	July 2025
3	CFO	Moved to 5 yearly policy	15.12.2026

Data Retention Policy

1. Introduction

This policy outlines how **Make It Different** stores, retains, and securely disposes of **all school data**, including pupil, staff, and operational records, in compliance with:

- **UK GDPR & Data Protection Act 2018**
- **The Education (Pupil Information) (England) Regulations 2005**
- **Keeping Children Safe in Education (KCSIE) 2024**
- **Limitation Act 1980**
- **Health & Safety at Work Act 1974**
- **Academy Trust Handbook**

2. Scope

This policy applies to all data held by the school, including:

- Pupil records (including SEND and safeguarding information)
- Staff employment records
- Governance documents
- Financial records
- Health & safety records
- CCTV footage
- Admissions records
- Examination and assessment data
- Procurement and contract records

- Asset and inventory records
- Complaints and disciplinary records
- Invoices, payments, and financial transactions
- Budget and financial planning records
- Tax and VAT records

3. Retention Periods for School Data

Record Type	Retention Period	Reason/Legislation
Pupil Records (General)	**Date of birth + 25 years**	Limitation Act 1980
SEND Records (EHCPs, IEPs, etc.)	**Until the pupil is 25 years old**	SEND Code of Practice 2015
Safeguarding Records	**Date of birth + 75 years**	KCSIE 2024
Exclusion Records	**Date of birth + 25 years**	Potential legal disputes
Staff Employment Records	**Termination date + 6 years**	Employment law
Payroll and Pensions	**Termination date + 12 years**	Financial compliance
Recruitment Records (unsuccessful candidates)	**6 months after recruitment process**	UK GDPR
Health & Safety Reports	**Date of report + 40 years**	Health & Safety at Work Act 1974
Accident/Incident Reports	**Date of incident + 25 years**	Health & Safety at Work Act 1974
Governance Documents (Board minutes, policies, etc.)	**Date of creation + 6 years**	Best practice
CCTV Footage	**30 days (unless part of an investigation)**	Data Protection Act 2018

Admissions Records	**Date of entry + 6 years**	Best practice
Examination & Assessment Data	**Current year + 6 years**	Education Act 1996
Procurement & Contract Records	**End of contract + 6 years**	Financial compliance
Asset & Inventory Records	**End of asset lifecycle + 6 years**	Financial best practice
Complaints & Disciplinary Records	**Closure of case + 6 years**	Legal compliance
Invoices, Payments & Financial Transactions	**Current financial year + 6 years**	Academies Financial Handbook
Budget & Financial Planning Records	**Current financial year + 6 years**	Financial best practice
Tax & VAT Records	**Current financial year + 6 years**	HMRC regulations

4. Secure Storage & Access

- All records are stored **securely**, either in **locked cabinets** (paper records) or **password-protected, encrypted digital systems**.
- Access is restricted to **authorised personnel only** based on job role.
- Audit logs track access to sensitive information.

5. Secure Transfer of Data

- Pupil records are transferred to new schools securely via **S2S (School to School) system** or **encrypted email**.
- Staff records are transferred securely between HR and payroll providers.
- A **receipt of transfer** is requested where applicable.

6. Disposal of Records

- **Paper records** are shredded using a **cross-cut shredder** or disposed of via a **confidential waste service**.
- **Digital records** are permanently deleted using **secure erasure software**.
- A **Data Disposal Log** is maintained for audit purposes.

7. Data Subject Rights & Compliance

- Data subjects (pupils, parents, and staff) have the right to **request access** to their records.
- Data breaches are reported and handled in line with **UK GDPR** requirements.
- Compliance is regularly reviewed through **internal audits**.

8. Policy Review

This policy is reviewed **5 yearly** by the **Data Protection Lead** and **Chief Financial Officer** to ensure compliance with current regulations.

Signed:
Wendy Pattison - CFO
Lorna McLean – CEO
Northumberland County Council – Data Protection Officer

Responsible Body:

Audit and Risk Committee

Review Date: July 2026 and 5 yearly thereafter unless legislation changes