DATA RETENTION POLICY

Keeping what is needed. Protecting information.
Disposing securely.



RIVERSIDE BRIDGE SCHOOL

INSPIRE, EMPOWER, ACHIEVE

This policy forms part of the Riverside Bridge School Policy Framework
and should be read alongside any related policies, procedures and guidance.

RIVERSIDE BRIDGE SCHOOL
INSPIRE, EMPOWER, ACHIEVE

OUR COMMITMENT

At Riverside Bridge School, every policy reflects our commitment to creating a safe, inclusive and ambitious school community in which every pupil is valued, every voice matters and every family is respected and supported.

Our policies translate our values into consistent practice. They support high expectations, clear responsibilities, effective partnership and informed decision-making, ensuring that the needs, rights, wellbeing and future outcomes of our pupils remain at the heart of our work.

We work collaboratively, act with integrity and continually reflect upon and improve our practice to achieve the best possible outcomes for every pupil.

POLICY PRINCIPLES

Our Policy Principles underpin how we work together and guide the decisions and actions we take to support every pupil and their families.



POLICY PURPOSE & FRAMEWORK

Riverside Bridge School policies set out the expectations, responsibilities and approaches that support safe, consistent and high-quality practice across the school. They translate our values, statutory responsibilities and professional expectations into clear guidance for everyday decision-making and practice.

Each policy forms part of the Riverside Bridge School Policy Framework and should be read alongside any related policies, procedures, statutory guidance and school frameworks referenced within the document.

Policies apply to the members of the school community identified within each document, including staff, governors, parents and carers, volunteers, contractors and other professionals where relevant. Everyone is expected to understand and apply the requirements appropriate to their role and to seek further guidance where clarification is required.

CURRICULUM DRIVERS



Our Drivers provide a shared golden thread across curriculum, school life, policy and leadership, helping ensure that our decisions and practice remain focused on the experiences and futures we want for every pupil.

STATEMENT OF INTENT

his policy sets out Riverside Bridge School's approach to the retention, review and secure disposal of records. It establishes the principles, responsibilities and arrangements through which the school ensures that information is kept for no longer than necessary, remains secure and accessible while required, and is disposed of appropriately when its retention period has ended.

Riverside Bridge School recognises that effective records management supports safeguarding, educational continuity, accountability, lawful decision-making and the efficient operation of the school. Records may need to be retained for statutory, regulatory, safeguarding, contractual, financial, employment or operational reasons, and different categories of information will require different retention periods.

The school also recognises that retaining information for longer than necessary can increase privacy and information-security risks, while disposing of records too early may undermine safeguarding, legal proceedings, regulatory investigations or the school's ability to demonstrate compliance and accountability.

As part of Partnership Learning, Riverside Bridge School will manage records in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, relevant statutory requirements, Department for Education guidance, Trust arrangements and recognised records-management good practice. The school will maintain a separate Data Retention Schedule setting out the standard retention periods for the principal categories of records it holds.

Retention periods will be applied consistently but with appropriate professional judgement. Where safeguarding, litigation, regulatory investigation, statutory inquiry or another legitimate reason requires records to be retained beyond the standard period, disposal will be suspended until it is safe and lawful to proceed.

Our responsibilities to individuals

Riverside Bridge School will manage information throughout its lifecycle in a way that protects the rights, privacy and wellbeing of the people whose information we hold. We will retain records only where there is a clear and lawful reason to do so, keep them secure and accessible while required, review them at appropriate intervals and dispose of them securely when they are no longer needed.

We will ensure that records subject to safeguarding, legal, regulatory or information-access requirements are preserved for as long as necessary and that significant retention and disposal decisions are documented appropriately.

Through these commitments, Riverside Bridge School aims to maintain records that are accurate, proportionate, secure and available for as long as they are genuinely required. We will continue to strengthen records-management practice so that information supports safeguarding, accountability and effective school operations without being retained unnecessarily.

RIVERSIDE BRIDGE SCHOOL
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APPROVED BY: Governing Board

APPROVED ON: September 2026

REVIEWED DUE ON: September 2027

Section 01

PURPOSE AND SCOPE

Defining requirements. Establishing scope. Managing records responsibly.

The purpose of this policy is to establish a clear and consistent framework for the management of records throughout their lifecycle. It supports Riverside Bridge School in retaining information for appropriate periods, protecting it while it is required and disposing of it securely when there is no longer a lawful or operational reason to keep it.

Effective retention arrangements enable the school to meet its statutory, safeguarding and regulatory responsibilities while supporting education, administration, decision-making and organisational accountability. They also help to ensure that personal information is not retained simply because it is technically possible or administratively convenient to do so.
This policy applies to all records created, received or maintained by Riverside Bridge School in the course of its work, regardless of format. This includes electronic and paper records, emails and digital communications, photographs, audio and video recordings, management information systems, safeguarding systems, financial systems, cloud-based systems and other media used to record school information.

For the purposes of this policy, a record means any document, dataset or item of recorded information that provides evidence of the school's activities or contains information relating to pupils, families, staff, governors, volunteers, contractors or other individuals.
The format of a record does not determine how long it should be retained. Retention will instead be determined by the content and purpose of the record, applicable statutory or regulatory requirements, safeguarding considerations and its continuing operational value.
This policy applies to all staff, governors, volunteers, contractors and other authorised persons who create, manage, access or dispose of records on behalf of Riverside Bridge School.

Detailed retention periods are maintained within the school's separate Data Retention Schedule. This operational schedule may be updated independently of this policy where changes to legislation, statutory guidance, Trust requirements or records-management practice make this necessary.

Section 02

ROLES AND RESPONSIBILITIES

Clarifying accountability. Sharing responsibility. Maintaining oversight.

Effective records management is a shared responsibility across Riverside Bridge School. Everyone who creates, accesses, manages or disposes of school information has a responsibility to ensure that records are handled appropriately throughout their lifecycle.

The Governing Board provides strategic oversight of the school's records-management arrangements. It will receive appropriate assurance that information is being retained and disposed of lawfully, that significant records-management risks are identified and addressed, and that the school continues to meet its data-protection, safeguarding and information-governance responsibilities.

The Headteacher has overall accountability for the effective implementation of this policy.
The Headteacher will ensure that:

- appropriate systems and procedures are in place for managing school records;
- staff understand their responsibilities for retention and disposal;
- sufficient resources are available to support effective records management;
- significant retention, disposal or compliance issues are addressed appropriately; and
- specialist Trust or professional advice is sought where necessary.

The School Data Protection Lead coordinates the school's records-retention arrangements and provides day-to-day oversight of this policy.
The School Data Protection Lead will maintain and review the Data Retention Schedule, provide advice to staff, support periodic review and secure disposal activity and ensure that records subject to safeguarding, legal or regulatory holds are not destroyed.
The role will also include maintaining appropriate evidence of significant disposal activity and liaising with the Trust Data Protection Officer where complex, exceptional or high-risk retention decisions arise.

Trust Data Protection Officer will provide specialist advice and support where required, particularly in relation to complex statutory requirements, exceptional or extended retention, legal or regulatory holds, information rights and high-risk disposal decisions.

All staff are responsible for creating and maintaining appropriate records and ensuring that information within their control is stored securely and managed in accordance with this policy and the Data Retention Schedule.

Staff must follow approved disposal arrangements, preserve records where they are aware that a safeguarding, legal, regulatory or information-access hold applies, and seek advice where they are uncertain whether information should be retained or destroyed.

Section 03

RETENTION PRINCIPLES

Keeping proportionately. Reviewing regularly. Disposing appropriately.

Riverside Bridge School will retain records only for as long as there is a clear and justifiable reason to do so. This reflects the storage-limitation principle under UK data-protection legislation and supports proportionate and responsible information governance.

Retention decisions will take account of the purpose for which the information was created, applicable statutory or regulatory requirements, safeguarding considerations, contractual or financial obligations and the continuing operational value of the record.

The school recognises that retaining information for longer than necessary can increase privacy and information-security risks. Equally, disposing of records too early may undermine safeguarding, legal proceedings, regulatory investigations, complaints or the school's ability to demonstrate accountability. Retention periods will therefore be applied consistently while allowing appropriate professional judgement where individual circumstances require it.

Records must remain secure, accurate and accessible throughout the period for which they are retained. When the applicable retention period has ended, the school will determine whether the record should be securely destroyed, anonymised where appropriate, or retained for longer because a specific and documented reason continues to apply.

Extended retention may be necessary where records are relevant to matters such as safeguarding concerns, complaints, insurance claims, disciplinary proceedings, legal action, regulatory investigations, Freedom of Information requests, Subject Access Requests or statutory inquiries.

Records must not be destroyed where the school knows, or reasonably anticipates, that they may be required for safeguarding, legal, regulatory, investigatory or information-access purposes.

Retention decisions will be guided by the following principles:

- **Necessity** - information will be retained only where there is a continuing reason to keep it.
- **Proportionality** - the retention period will reflect the nature, sensitivity and purpose of the record.
- **Security** - records will remain appropriately protected throughout their lifecycle.
- **Accessibility** - records that need to be retained must remain retrievable and usable.

- **Accountability** - significant retention and disposal decisions will be capable of being explained and evidenced.
- **Secure disposal** - information that is no longer required will be destroyed in an appropriate and secure manner.

Section 04

SECURE STORAGE OF RECORDS

Protecting records. Controlling access. Maintaining availability.

Records must remain appropriately secure throughout their retention period. Riverside Bridge School will use proportionate physical, technical and organisational measures to protect information from unauthorised access, accidental loss, theft, damage, alteration, inappropriate disclosure or premature destruction.

Electronic records will be stored only within approved school or Trust systems with appropriate authentication, access controls, security and backup arrangements. Access will be limited according to role and legitimate operational need.

Paper records containing personal, sensitive or confidential information will be stored securely and access will be restricted to authorised individuals. Records must not be left unattended in locations where they could be accessed, viewed or removed inappropriately.

Where third-party or cloud-based systems are used to hold school records, the school will ensure that appropriate data-protection, contractual, information-security and retention arrangements are in place.

Records must also remain retrievable throughout their retention period. Retention is not simply a requirement to preserve information; records must remain sufficiently accessible, readable and usable to fulfil the purpose for which they are being retained.

Where records are transferred between systems, archived or migrated to new technology, appropriate measures will be taken to protect their integrity and ensure that information which remains subject to a retention requirement is not inadvertently lost or destroyed.

The school's wider requirements for protecting information and digital systems are set out within the Information Security Policy and associated Trust arrangements.

Section 05

RETENTION PERIODS

Applying schedules. Using judgement. Keeping records only as required.

Riverside Bridge School maintains a separate Data Retention Schedule which identifies the standard retention periods for the principal categories of records held by the school.

The schedule is informed by statutory requirements, Department for Education guidance, Partnership Learning requirements, recognised records-management guidance and the operational requirements of the school.

It covers the main categories of information processed across the school, including pupil and educational records, safeguarding and child protection information, SEND records, attendance information, staffing and recruitment records, payroll and financial information, governance records, health and safety documentation, contracts and procurement records, ICT and information-security records and other operational information.

For each category, the schedule should identify the appropriate retention period and the point from which that period is calculated. Where relevant, it should also identify the action required at the end of the period and any significant statutory, safeguarding or regulatory exceptions.

The Data Retention Schedule provides a consistent starting point for retention decisions but does not remove the need for professional judgement. Where a specific statutory requirement, safeguarding consideration, legal instruction or formal Trust or DPO direction applies, that requirement will take precedence over the standard schedule.

Retention periods must not be treated as automatic permission to retain information indefinitely. When a standard retention period ends, the school will consider whether there remains a lawful and justifiable reason to keep the information.

Where there is no continuing reason for identifiable information to be retained, the record will normally be securely destroyed. Where there is a legitimate continuing purpose for the information but personal identification is no longer necessary, anonymisation may be considered where appropriate.

The Data Retention Schedule will be reviewed regularly and may be updated independently of this policy where legislation, statutory guidance, Trust arrangements or operational requirements change.

Section 06

SECURE DISPOSAL OF RECORDS

Destroying securely. Preventing recovery. Recording disposal.

When records reach the end of their retention period and there is no lawful or operational reason to retain them, they will be disposed of securely and in a way that reflects the nature and sensitivity of the information they contain.

Disposal must ensure that personal or confidential information cannot reasonably be recovered, reconstructed or accessed by unauthorised individuals.

Secure disposal may include:

confidential shredding or approved confidential-waste arrangements for paper records;

secure deletion of electronic information from active systems;

secure wiping or destruction of storage devices and removable media; and

specialist disposal arrangements for equipment containing confidential information.

Confidential records must never be placed in general waste or ordinary recycling where information could be recovered.

Where third-party disposal providers are used, appropriate contractual and security arrangements will be maintained. The school will obtain evidence of secure destruction where this is appropriate to the nature or volume of information being disposed of.

Where records also exist within backup systems, they will be managed in accordance with the school's backup and system-retention arrangements. Information that has reached the end of its retention period should not be unnecessarily restored into active use.

Significant or organised disposal activity will be documented appropriately so that the school can demonstrate what was destroyed, when destruction took place and who authorised it. The level of documentation required will be proportionate to the nature and sensitivity of the records concerned.

No record subject to a safeguarding, legal, regulatory or information-access hold may be destroyed until the hold has been formally lifted.

Section 07

SAFEGUARDING, LITIGATION AND EXTENDED RETENTION

Preserving evidence. Protecting pupils. Suspending disposal where necessary.

Some records may need to be retained beyond the standard periods set out in the Data Retention Schedule because of safeguarding, legal, regulatory or other significant considerations.
Where records are relevant to a safeguarding concern, complaint, police investigation, disciplinary matter, employment dispute, insurance claim, legal proceedings, statutory inquiry, regulatory investigation, Freedom of Information request or Subject Access Request, routine disposal may need to be suspended.

In these circumstances, relevant records will be preserved until the matter has been fully concluded and any continuing retention requirement has been considered.

Safeguarding records

Safeguarding and child protection records require particular care because of their importance in protecting pupils, supporting continuity between settings and enabling future safeguarding enquiries.

Child protection files will normally be retained in accordance with current statutory and Department for Education requirements and the school's Data Retention Schedule. Current DfE record-keeping guidance states that child protection files should be retained until the child's 25th birthday and that files relating to child sexual abuse should be retained until the child's 75th birthday.

Where safeguarding information transfers with a pupil to another school or college, it will be transferred securely and separately from the main pupil file in accordance with current safeguarding requirements. Riverside Bridge School will maintain an appropriate record of the transfer.

Records relating to serious or historic safeguarding matters may need to be retained beyond standard periods where there is an ongoing investigation, litigation, public or statutory inquiry, historic safeguarding concern or another clear and documented justification.

Where there is uncertainty about the retention or disposal of safeguarding information, advice will be sought from the Designated Safeguarding Lead and, where appropriate, the Trust Data Protection Officer or legal advisers before any information is destroyed.

Legal and regulatory holds

Where the school is aware of current or reasonably anticipated litigation, investigation, complaint, statutory inquiry or regulatory action, relevant records must be preserved irrespective of the normal retention period.

The School Data Protection Lead will work with the appropriate school or Trust lead to identify records affected by the hold and ensure that routine disposal is suspended.

A hold will remain in place until the school receives appropriate confirmation that normal retention and disposal arrangements may resume.

Extended retention decisions will be documented and reviewed periodically. Records will not be retained indefinitely merely because they might potentially be useful in the future; there must remain a clear and continuing justification for retaining them.

Section 08

MONITORING AND REVIEW

Monitoring compliance. Reviewing schedules. Strengthening practice.

The Headteacher has overall responsibility for ensuring that effective records-management arrangements are maintained across Riverside Bridge School and that the requirements of this policy are implemented consistently.

The School Data Protection Lead will maintain oversight of the Data Retention Schedule, provide advice to staff and coordinate appropriate review and disposal activity. This will include monitoring records subject to extended retention or legal holds and ensuring that relevant changes to legislation, regulatory guidance or Trust requirements are reflected within the school's arrangements.

The school will periodically review the information it holds to identify records that have reached the end of their retention period or for which there is no longer a valid retention purpose. Records should not continue to be retained simply because it is easier to keep them than to make an appropriate retention decision.

Monitoring will take account of significant disposal activity, identified weaknesses in records management, information that cannot readily be retrieved, repeated uncertainty about retention periods and any relevant issues identified through information-access requests, data breaches, safeguarding reviews or other governance activity.

Where monitoring identifies weaknesses or inconsistencies, the school will consider whether changes are required to systems, procedures, staff guidance, training or the Data Retention Schedule.

The Trust Data Protection Officer will be consulted where monitoring identifies complex, high-risk or recurring information-governance concerns.

The Governing Board will receive appropriate assurance that records are being managed lawfully, significant retention risks are being addressed, disposal arrangements remain secure and the school continues to meet its statutory, safeguarding and information-governance responsibilities.

This policy will be reviewed annually, or sooner where significant changes to legislation, statutory guidance, Trust arrangements or school operations make this necessary.

The Data Retention Schedule will be reviewed separately and may be updated independently of this policy.

Section 09

RELATED POLICIES & FRAMEWORKS

Connecting practice. Strengthening consistency.

This policy should be read alongside the following Riverside Bridge School and Partnership Learning policies, frameworks and information-governance arrangements, where relevant:

- Data Protection (GDPR) Policy
- Information Security Policy
- Data Breach Response Policy
- Subject Access Request Policy
- Freedom of Information Policy
- CCTV Policy
- Safeguarding and Child Protection Policy
- ICT Acceptable Use Policy
- Online Safety Policy
- Staff Code of Conduct
- Partnership Learning information-governance arrangements

These documents collectively support the secure, lawful and proportionate management of information throughout its lifecycle.

Where different statutory, safeguarding or information-governance requirements apply to the same record, they should be considered together. Advice should be sought from the School Data Protection Lead, Trust Data Protection Officer, Designated Safeguarding Lead or other appropriate specialist where uncertainty remains.

Operational materials supporting this policy, including the detailed Data Retention Schedule, disposal records and administrative guidance, are maintained separately. They may be updated as legislation, guidance or operational requirements change without requiring formal revision of this policy, provided that they remain consistent with its principles and requirements.

APPENDIX

Data Retention Schedule

The Riverside Bridge School Data Retention Schedule is maintained as a separate operational document and does not form part of the detailed content of this policy.

The schedule establishes the standard retention arrangements for the principal categories of information held by the school. It provides staff with a practical reference point when determining how long records should be retained and what should happen when the relevant retention period ends.

For each relevant category of record, the schedule should identify:

- the record or information category;
- the purpose for which it is retained;
- the standard retention period;
- the event or date from which the retention period begins;
- the action required at the end of the retention period;
- significant safeguarding, legal or regulatory exceptions;
- the source of the retention requirement or guidance where appropriate.

The schedule is informed by applicable statutory requirements, Department for Education guidance, Partnership Learning requirements, recognised records-management guidance and the operational needs of Riverside Bridge School.

The Data Retention Schedule will be reviewed regularly and may be amended independently of this policy where retention requirements change.

Where a record is subject to safeguarding, litigation, investigation, regulatory action, an information-access request or another formal hold, the standard disposal date will be suspended until the school has confirmed that disposal may safely resume.

Where uncertainty exists about the correct retention period or whether a record can be destroyed, staff must seek advice from the School Data Protection Lead before disposal takes place.