


# The Bayleaf Hub Data Retention Policy

Approved By	
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Next Review Date	November 2026

## 1. Policy Statement

The Bayleaf Hub is committed to ensuring that personal data is processed in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018.

We will only retain personal data for as long as necessary to fulfil the purposes for which it was collected, including satisfying legal, accounting, safeguarding, and reporting requirements. ([GOV.UK](https://www.gov.uk))

## 2. Scope

This policy applies to:

- All personal data held by the school
- All formats (paper, electronic, images, CCTV, etc.)
- All staff, governors, volunteers, and contractors

## 3. Principles

The school adheres to the following principles:

- Data is **kept no longer than necessary** (storage limitation principle)
- Retention periods are **justified and documented**
- Data is **reviewed regularly (at least annually)** ([GOV.UK](https://www.gov.uk))
- Data is **securely destroyed** when no longer required

## 4. Roles and Responsibilities

- **Headteacher / Data Controller:** Overall responsibility for compliance
- **Data Protection Officer (DPO):** Advises and monitors compliance
- **All Staff:** Must follow retention procedures and report concerns

## 5. Data Retention Schedule

The school maintains a retention schedule covering key categories:

## 5.1 Pupil Records

Record Type	Retention Period	Action
Primary pupil records	Until transfer + 2 terms	Transfer to next school
Secondary pupil records	Until age 25	Secure disposal
Safeguarding files	Until age 25 (or 75 for abuse cases)	Secure disposal

([GOV.UK](https://www.gov.uk))

## 5.2 Staff Records

Record Type	Retention Period
Personnel files	6 years after employment ends
Safeguarding allegations	Until retirement age or 10 years

## 5.3 Governance & Financial Records

Record Type	Retention Period
Governing body minutes	10 years
Financial records	6 years

## 5.4 Other Records

- CCTV footage: Typically 30 days (unless required for investigation)
- Emails: In line with business need
- Attendance registers: Minimum 3 years

## 6. Lawful Basis for Retention

Retention decisions are based on:

- Legal obligations (e.g. education law, safeguarding)
- Public task (education provision)
- Legitimate interests
- Limitation periods for legal claims

The school documents justification for retaining each category of data. ([GOV.UK](https://www.gov.uk))

## 7. Data Review and Audit

- Annual audit of all data held
- Identification of:
  - Data to retain
  - Data to delete
  - Data to anonymise

This ensures compliance and reduces risk. ([GOV.UK](#))

## 8. Secure Disposal

When data reaches the end of its retention period:

- Paper records are **cross-shredded**
- Digital data is **securely deleted or destroyed**
- External disposal providers must supply a **certificate of destruction**

Records of destruction will be maintained in line with the Freedom of Information Act 2000. ([GOV.UK](#))

## 9. Archiving and Anonymisation

Where appropriate:

- Data may be anonymised for research or statistical purposes
- Identifiable information is removed or replaced

## 10. Data Subject Rights

Individuals have rights under UK GDPR, including:

- Right to access
- Right to rectification
- Right to erasure (subject to legal exemptions)

## 11. Policy Review

This policy will be reviewed:

- Annually
- Following legislative or regulatory changes

## 12. Related Policies



- Data Protection Policy
- Information Security Policy
- Safeguarding Policy

## **Appendix A – Retention Schedule**

(A full, detailed schedule should be maintained separately and updated regularly.)