Data Retention, Storage and Secure Disposal Policy and Procedure

Purpose

Manor Farm Fun Ltd recognises the importance of managing personal information responsibly throughout the period in which it is held.

As an alternative provision setting working with children and young people, Manor Farm holds a range of personal, educational, safeguarding, health, SEND and family information. This information must be stored securely, accessed appropriately and retained only for as long as there is a legitimate reason or legal requirement to do so.

This policy sets out:

- the types of information Manor Farm may hold;
- how information must be stored and protected;
- how long information should normally be retained;
- circumstances in which information must be retained for longer;
- responsibilities for reviewing and securely disposing of information; and
- procedures for the secure destruction or deletion of information when the applicable retention period has ended.

Manor Farm's general retention principle is that information relating to a young person will be safely purged six years after the young person leaves Manor Farm, unless a longer retention period is required by law, safeguarding requirements, an ongoing legal matter, contractual obligations, insurance requirements or another legitimate and documented reason.

Safeguarding records and accident and incident reports relating to a young person must be retained until the young person reaches 21 years of age, regardless of when the young person leaves Manor Farm.

This policy should be read alongside Manor Farm's Data Protection Policy, Safeguarding and Child Protection Policy and GDPR and Privacy Policy.

Scope

This policy applies to information held in any format, including:

- paper records;
- electronic records;
- emails;
- electronic databases and management information systems;
- safeguarding records;

- CPOMS records;
- attendance information;
- Provision Plans;
- EHCP-related documentation;
- individual child risk assessments;
- professional reports;
- communication records;
- photographs and videos;
- accident and incident records;
- medical information;
- parent/carer correspondence;
- records of meetings;
- assessment and progress information;
- funding and commissioning records;
- referral and admission information;
- behaviour and regulation records;
- records relating to external professionals and agencies; and
- any other information that identifies, or could reasonably identify, a young person, family member or member of staff.

The policy applies whether information is held on Manor Farm premises, remotely or through an approved third-party digital system.

Data Protection Principles

Manor Farm will manage personal information in accordance with the principles of UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

In particular, Manor Farm will ensure that personal information is:

1. processed lawfully, fairly and transparently;
2. collected for specified and legitimate purposes;
3. adequate, relevant and limited to what is necessary;
4. accurate and kept up to date where necessary;
5. not retained for longer than necessary;
6. processed securely and protected against unauthorised access, loss, destruction or damage; and
7. handled in a manner that enables Manor Farm to demonstrate appropriate compliance.

DfE guidance recommends that education settings maintain a data retention schedule, regularly audit the information they hold and securely dispose of information that is no longer required.

General Retention Principle
Unless a longer period is required under this policy or by law:

Manor Farm will retain information relating to a young person for six years following the date on which the young person leaves the setting. Following the end of the applicable retention period, information will be securely destroyed or permanently deleted.

For the purposes of this policy, the date the young person leaves Manor Farm is the date on which their placement formally ends and they are no longer receiving provision from Manor Farm.

Where a young person has more than one period of attendance at Manor Farm, the retention period should normally be calculated from the end of the most recent period of attendance.

Routine and Low-Level Communications
The six-year retention period outlined within this policy does **not** mean that Manor Farm is required to retain every piece of communication relating to a young person for six years.

Staff are expected to use their professional judgement when determining whether a communication or record contains information that is relevant to the young person's educational, safeguarding, SEND, health, wellbeing, attendance, provision or other significant records.

Routine, low-level or everyday communications that do not form part of the young person's formal record and are not required for future reference may be safely discarded once they are no longer needed.

Examples may include:

- routine arrangements regarding collection or drop-off;
- everyday logistical communications;
- routine reminders;
- short-term administrative queries that have been resolved;
- duplicate copies of information already appropriately recorded elsewhere; and
- other low-level communications that do not contain information requiring ongoing retention.

Staff should consider whether the information:

1. contributes to an understanding of the young person's needs, provision, progress, safeguarding or wellbeing;
2. records a significant decision, action or professional judgement;
3. may reasonably be required as evidence at a later date;
4. forms part of a formal record or ongoing case history;
5. relates to an accident, incident, safeguarding concern, complaint, investigation or legal matter; or
6. is subject to a specific statutory, contractual or other retention requirement.

Where the answer to these considerations is **no**, staff may use their professional judgement to securely dispose of the information once it has fulfilled its purpose.

Manor Farm's approach is to retain information where there is a clear and legitimate purpose for doing so, while avoiding the unnecessary accumulation of personal information.

Where staff are unsure whether a communication should be retained, they should seek advice from the CEO, SENCo, Designated Safeguarding Lead, or a member of the Senior Leadership Team before disposing of it.

The six-year retention period therefore applies to relevant records that Manor Farm has a legitimate reason to retain; it does not require the blanket retention of all communications for six years.

Exceptions to the Six-Year Retention Period

The six-year retention period is Manor Farm's general standard and does not override a specific statutory, safeguarding, contractual or legal requirement to retain information for longer.

Information must be retained beyond six years where:

- legislation requires a longer retention period;
- the information forms part of a safeguarding or child protection record requiring longer retention;
- there is an ongoing safeguarding concern or investigation;
- the information is required for an ongoing legal claim, tribunal, complaint, investigation or litigation;
- the information is required for an insurance matter;
- a Local Authority or other commissioning body has specified a longer retention requirement;

- the information is subject to a legal hold;
- the information is required for an ongoing regulatory or statutory investigation; or
- Manor Farm's Data Protection Lead / Senior Leadership Team determines that there is a documented and legitimate reason for retaining the information for longer.

Where information is retained beyond the standard period, the reason for doing so should be documented.

Data Retention Schedule

Record / Information Type	Standard Retention Period	Action at End of Retention Period
Admission and referral information	6 years after the young person leaves Manor Farm	Securely destroy/delete
EHCP-related records and correspondence	6 years after the young person leaves Manor Farm, unless a longer period applies	Securely destroy/delete
Provision Plans and individual support records	6 years after the young person leaves Manor Farm	Securely destroy/delete
Educational assessments and progress records	6 years after the young person leaves Manor Farm	Securely destroy/delete
Attendance records	6 years after the young person leaves Manor Farm, unless a longer statutory requirement applies	Securely destroy/delete
Parent/carer correspondence	6 years after the young person leaves Manor Farm, unless a professional judgement call has been decided based on low level communications	Securely destroy/delete
Professional reports and advice	6 years after the young person leaves Manor Farm	Securely destroy/delete
Meeting notes and records of professional meetings	6 years after the young person leaves Manor Farm	Securely destroy/delete
SEND-related records	6 years after the young person leaves Manor Farm, unless required for longer	Securely destroy/delete

Medical information held by WH	6 years after the young person leaves Manor Farm, unless a longer legal requirement applies	Securely destroy/delete
Behaviour and regulation records	6 years after the young person leaves Manor Farm	Securely destroy/delete
Photographs and videos	6 years after the young person leaves Manor Farm, unless consent/legitimate purpose ends earlier	Securely delete
Communication records/emails	6 years after the young person leaves Manor Farm, where retained as part of the young person's record	Securely delete
Funding and commissioning records relating to an individual young person	6 years after the young person leaves Manor Farm, subject to financial/legal requirements	Securely destroy/delete
Accident reports	Until the young person reaches 21 years of age	Securely destroy/delete
Incident reports	Until the young person reaches 21 years of age	Securely destroy/delete
Accident/incident investigation records	Until the young person reaches 21 years of age, or longer if required due to legal proceedings	Securely destroy/delete
Safeguarding/child protection records	Until the young person reaches 21 years of age	Securely destroy/delete when the applicable safeguarding retention period expires
Records subject to legal proceedings or investigation	Until the matter is concluded and the applicable retention period has expired	Securely destroy/delete
Staff records relating to a young person's support	6 years after the young person leaves Manor Farm, where relevant to the young person's record	Securely destroy/delete

Important: Where two retention periods could apply, Until the young person reaches 21 years of age will apply the longer applicable retention period.

Accident and Incident Records

Due to the potential importance of accident and incident records in relation to safeguarding, health and safety, insurance, complaints and potential future claims, Manor Farm has adopted an extended retention period.

Accident and incident records involving a young person must be retained until the young person reaches 21 years of age.

This applies to:

- accident forms;
- incident reports;
- records of injuries;
- records of significant behavioural or safety incidents;
- records of incidents involving other young people where the individual can be identified;
- records of actions taken following an accident or incident;
- relevant photographs;
- witness statements;
- correspondence relating to the incident; and
- investigation records.

Where an accident or incident results in an ongoing complaint, legal claim, safeguarding investigation or other formal process, the relevant records must not be destroyed at the point the young person reaches 21 if a longer retention period is required.

The Senior Leadership Team must identify any such records and place them under an appropriate legal or safeguarding hold.

Safeguarding and Child Protection Records

Safeguarding and child protection records involving a young person must be retained until the young person reaches 21 years of age.

Safeguarding and child protection records must be managed in accordance with current safeguarding legislation, statutory guidance and Manor Farm's Safeguarding and Child Protection Policy.

Where safeguarding records are transferred to another education setting or relevant agency, Manor Farm must ensure that the transfer is secure and appropriately documented.

DfE guidance currently identifies longer retention periods for child protection records than the general pupil-record retention period, demonstrating the importance of applying the specific retention requirement applicable to safeguarding information.

Storage and Security

All personal information must be stored securely and only accessed by individuals who require the information to carry out their role.

Paper records

Paper records must:

- be stored in secure, access-controlled areas;
- not be left unattended in communal areas;
- be returned to secure storage after use;
- not be removed from Manor Farm unless there is a legitimate reason;
- be transported securely where removal is necessary; and
- be securely shredded when the applicable retention period ends.

Electronic records

Electronic records must:

- be stored on our secure online database;
- be protected by appropriate passwords and access controls;
- only be accessible to authorised individuals;
- not be stored on personal devices unless specifically authorised;
- not be transferred using unauthorised cloud storage or personal email accounts;
- be protected from unauthorised disclosure; and
- be permanently deleted when the retention period ends.

Staff must not retain copies of Manor Farm records on personal devices, personal email accounts, USB devices or personal cloud storage.

Annual Data Retention Review

Manor Farm will undertake an annual review of the personal information it holds.

The review will consider:

- what information Manor Farm currently holds;
- why the information is being retained;
- whether it is still required;
- whether the applicable retention period has expired;
- whether a longer retention period applies;
- whether information can be securely destroyed;
- whether information should be transferred to another organisation;

- whether electronic records have been duplicated unnecessarily; and
- whether access permissions remain appropriate.

The annual review will be overseen by the Senior Leadership Team.

DfE guidance recommends that education settings audit the personal information they hold at least annually and document decisions about retention and disposal.

Procedure for Secure Disposal
When a retention period expires, the responsible member of staff must first confirm that:

1. the applicable retention period has expired;
2. no legal, safeguarding, complaint, investigation or insurance matter requires the information to be retained;
3. there is no legal hold in place;
4. the information is not required for an outstanding request or investigation; and
5. no other statutory retention requirement applies.

Once confirmed, the information must be securely destroyed.

Paper information
Paper records containing personal information must be:

- cross-cut shredded; or
- disposed of through an approved confidential waste/shredding service.

Personal information must never be placed in ordinary waste or recycling.

Electronic information
Electronic information must be permanently deleted from:

- relevant folders;
- approved databases where appropriate;
- email accounts where the email constitutes a retained record;
- shared drives;
- approved cloud storage; and
- other systems under Manor Farm's control.

Where information is held on a third-party system, Manor Farm will follow the provider's secure deletion procedures and contractual arrangements.

Deleting a file from a folder without considering backups, duplicate copies or other storage locations does not necessarily constitute complete disposal. Manor Farm will

take reasonable steps to ensure information is securely removed from systems under its control.

Disposal Record
Manor Farm will maintain a record of significant data disposal activity.

The disposal record should include:

- date of disposal;
- type of information destroyed;
- young person's identifier or reference, where appropriate;
- applicable retention period;
- reason for disposal;
- method of disposal;
- person authorising disposal; and
- person completing or overseeing disposal.

The disposal record itself should contain only the minimum information necessary to evidence that secure disposal has taken place.

Data Breaches and Loss of Information
Any suspected loss, unauthorised access, accidental disclosure or inappropriate destruction of personal information must be reported immediately to the CEO or designated member of the Senior Leadership Team.

Examples include:

- a lost paper file;
- an email sent to the wrong recipient;
- a lost or stolen device containing Manor Farm information;
- accidental deletion of important records;
- unauthorised access to CPOMS or another system;
- inappropriate sharing of information;
- disposal of confidential records in general waste.

Manor Farm will assess and manage suspected data breaches in accordance with its Data Protection Policy and applicable UK GDPR requirements.

Responsibilities
Senior Leadership Team:
The Senior Leadership Team is responsible for:

- ensuring this policy is implemented;
- ensuring appropriate systems are in place for data retention and disposal;

- ensuring staff understand their responsibilities;
- authorising retention beyond standard periods where appropriate;
- overseeing annual retention reviews; and
- ensuring appropriate action is taken following a data breach.

SENCo:
The SENCo is responsible for:
- supporting the appropriate management of SEND and educational records;
- ensuring information is stored appropriately;
- supporting annual data audits;
- identifying records that may require extended retention; and
- ensuring records are not destroyed where safeguarding, legal or other requirements require continued retention.

Designated Safeguarding Lead:
The DSL is responsible for:
- overseeing the retention and secure management of safeguarding information;
- ensuring safeguarding records are retained in accordance with applicable requirements;
- identifying records that must be retained beyond Manor Farm's standard six-year period; and
- ensuring appropriate secure transfer of safeguarding records where required.

All Staff:
All staff are responsible for:
- following this policy;
- keeping information secure;
- only accessing information required for their role;
- not retaining unauthorised copies;
- reporting data breaches or losses immediately; and
- ensuring information is not retained unnecessarily.

Transfer of Records When a Young Person Leaves Manor Farm
When a young person leaves Manor Farm, relevant records may need to be transferred securely to:
- the young person's school;
- another alternative provision;
- the Local Authority;
- a college or other post-16 provider;
- another relevant education or professional service; or
- another organisation where there is a lawful basis for sharing.

Only information that is relevant and necessary should be transferred.

Where the original record is transferred, Manor Farm should retain appropriate evidence that the transfer took place.

The six-year retention period will continue to apply to Manor Farm's remaining records unless a different statutory or legal retention requirement applies.

Requests for Information
The existence of a retention period does not prevent an individual from exercising their rights under applicable data protection legislation.

Requests for access to personal information, requests for correction, or other data protection requests must be handled in accordance with Manor Farm's Data Protection Policy and applicable legislation.

Information must not be deleted simply because a data subject has made a request where doing so would interfere with a legal obligation or legitimate process.

Review of the Policy
This policy will be reviewed annually, or sooner where there are:

- changes to legislation;
- changes to DfE or safeguarding guidance;
- changes to Manor Farm's provision or systems;
- significant data protection incidents;
- changes to contractual or commissioning requirements; or
- identified weaknesses in existing procedures.

The retention schedule will also be reviewed annually to ensure that retention periods remain appropriate and legally compliant.

Policy Statement
Manor Farm is committed to ensuring that personal information is handled responsibly, securely and proportionately.

Manor Farm will not retain personal information indefinitely. As a general rule, information relating to a young person will be safely purged six years after they leave Manor Farm, subject to any longer legal, safeguarding, contractual, insurance or other legitimate retention requirement.

All safeguarding and protections records and accident and incident reports relating to a young person will be retained until the young person reaches 21 years of age, with records retained for longer where an ongoing legal, safeguarding, insurance or investigative matter requires this.

At the end of the applicable retention period, information will be securely destroyed or permanently deleted in a manner appropriate to its format and sensitivity.

This approach supports Manor Farm's responsibilities under data protection legislation while ensuring that important educational, safeguarding, health and safety information remains available for an appropriate period where there is a legitimate need for it.

This policy will be reviewed annually or sooner if required.
Policy Last Reviewed: 23rd September 2026
Next Review Due: 23rd September 2027