

Hull Collaborative Academy Trust



Data Protection and Document Retention Policy

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Related Trust Policies	• Freedom of Information Policy • Freedom of Information Publication Scheme • Child Protection and Safeguarding Policy • ICT Acceptable Use Policy • Privacy Notices (Staff, Pupils, Parents, Volunteers) • Data Protection Complaints Procedure
Related national guidance	• The UK General Data Protection Regulation (UK GDPR) • Data Protection Act 2018 (DPA) • School Standards and Framework Act 1998 • Freedom of Information Act 2000 • Electronic Commerce (EC Directive) Regulations 2002 • The Privacy and Electronic Communications (EC Directive) Regulations 2003 • The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 • The Education (Pupil Information) (England) Regulations 2005 (as amended in 2018) • Protection of Freedoms Act 2012 • DfE (2023) 'Keeping children safe in education 2023' • IRMS Toolkit for Schools (Information and Records Management Society) • Data (Use and Access) Act 2025 • ICO Complaints Handling Guidance (2026)
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Statement of Intent

Hull Collaborative Academy Trust and its academies is required to keep and process certain information about its staff members, pupils, their families, volunteers and external contractors in accordance with its legal obligations under data protection legislation.

The Trust may, from time to time, be required to share personal information about its staff or pupils with other organisations, mainly the LA, DfE, other schools and educational bodies, and potentially children's services.

This policy is in place to ensure all staff and governors are aware of their responsibilities and outlines how the school complies with the following core principles of the UK GDPR.

Organisational methods for keeping data secure are imperative, and the Trust believes that it is good practice to keep clear practical policies, backed up by written procedures.

1. Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA)
- School Standards and Framework Act 1998
- Freedom of Information Act 2000
- Electronic Commerce (EC Directive) Regulations 2002
- The Privacy and Electronic Communications (EC Directive) Regulations 2003
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2018)
- Protection of Freedoms Act 2012
- DfE (2023) 'Keeping children safe in education 2023' This policy also has regard to the

following guidance:

- ICO (2022) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- ICO (2012) 'IT asset disposal for organisations'
- DfE (2023) 'Data protection in schools'

This policy operates in conjunction with the following school policies:

- Freedom of Information Policy
- Freedom of Information Publication Scheme
- Child Protection and Safeguarding Policy

2. Applicable Data

For the purpose of this policy, '**personal data**' refers to information that relates to an identifiable, living individual, including information such as an online identifier, e.g. an IP address. The UK GDPR applies to both automated personal data and to manual filing systems, where personal data is accessible according to specific criteria, as well as to chronologically ordered data and pseudonymised data, e.g. key-coded.

‘Sensitive personal data’ is referred to in the UK GDPR as ‘special categories of personal data’, and is defined as:

- Genetic data.
- Biometric Data *(it should be noted that the Trust does not currently use any systems that operate with the use of biometric data. Should this change, a policy change will be made accordingly).*
- Data concerning health.
- Data concerning a person’s sexual orientation.
- Personal data which reveals:
 - Racial or ethnic origin.
 - Political opinions.
 - Religious or philosophical beliefs.
 - Trade union membership.

3. Principles

In accordance with the requirements outlined in the UK GDPR, personal data will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The UK GDPR also requires that “the controller shall be responsible for, and able to demonstrate, compliance with” the above principles.

4. Accountability

The Trust will put in place appropriate technical and organisational measures to demonstrate that data is processed in line with the principles set out in the UK GDPR, and will provide comprehensive, clear and transparent privacy policies.

Internal records of processing activities will include the following:

- Name and details of the organisation
- Purpose(s) of the processing
- Description of the categories of individuals and personal data
- Retention schedules
- Categories of recipients of personal data
- Description of technical and organisational security measures
- Details of transfers to third countries, including documentation of the transfer mechanism safeguards in place.

The Trust will also document other aspects of compliance with the UK GDPR and DPA where this is deemed appropriate in certain circumstances by the DPO, including the following:

- Information required for privacy notices, e.g. the lawful basis for the processing
- Records of consent
- Controller-processor contracts
- The location of personal data
- Data Protection Impact Assessment (DPIA) reports
- Records of personal data breaches

The Trust will implement measures that meet the principles of data protection by design and data protection by default, such as:

- Minimising the processing of personal data
- Pseudonymising personal data as soon as possible
- Ensuring transparency in respect of the functions and processing of personal data
- Allowing individuals to monitor processing
- Continuously creating and improving security features

DPIAs will be used to identify and reduce data protection risks, where appropriate.

Additional DUAA 2025 requirements:

The Trust will also maintain enhanced accountability documentation required under the Data (Use and Access) Act 2025, including:

- Transfer Impact Assessments (TIAs)
- Documentation of safeguards for automated decision-making
- A Data Protection Complaints Log
- Updated privacy notices reflecting DUAA changes
- Proportionate and reasonable search protocols for SARs

5. Data Protection Officer (DPO)

The Trust is required to appoint a DPO who will be the central point of contact for all data subjects and others in relation to matters of data protection.

A DPO will be appointed in order to:

- Inform and advise the school and its employees about their obligations to comply with the UK GDPR and other data protection laws.
- Monitor the school's compliance with the UK GDPR and other laws, including managing internal data protection activities, advising on DPIAs, conducting internal audits, and providing the required training to staff members.
- Cooperate with the ICO and act as the first point of contact for the ICO and for individuals whose data is being processed.

The DPO will operate independently and will not be dismissed or penalised for performing their duties. Sufficient resources and appropriate access will be provided to the DPO to enable

Staff will ensure that they involve the DPO in all data protection matters closely and in a timely manner.

The DPO is responsible for:

- Coordinating a proactive and preventative approach to data protection.
- Calculating and evaluating the risks associated with the Trust's data processing.
- Having regard to the nature, scope, context, and purposes of all data processing.
- Prioritising and focussing on more risky activities, e.g. where special category data is being processed.
- Promoting a culture of privacy awareness throughout the Trust community.
- Carrying out ad hoc reviews of data practices to ensure staff understand and are acting in accordance with relevant data protection laws.

6. Lawful Processing

The legal basis for processing data will be identified and documented prior to data being processed.

The Trust has privacy notices for the following groups, which outline the information above that is specific to them:

- HCAT Staff
- HCAT Pupils
- HCAT Parents/carers
- HCAT Volunteers

Under the UK GDPR, data will be lawfully processed under the following conditions:

- The consent of the data subject has been obtained.
- Processing is necessary for a contract held with the individual, or because they have asked the Trust to take specific steps before entering into a contract.
- Processing is necessary for compliance with a legal obligation (not including contractual obligations).
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

- Processing is necessary for protecting vital interests of a data subject or another person, i.e. to protect someone's life.
- Processing is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject – this condition is not available to processing undertaken by the school in the performance of its tasks.

Recognised Legitimate Interests (DUAA 2025)

Under the Data (Use and Access) Act 2025, certain processing activities may fall under Recognised Legitimate Interests, which do not require a full balancing test. These include safeguarding, emergency response, internal administrative transfers, network and information security, and direct marketing.

Where processing falls within these categories, the Trust will document the purpose and ensure transparency through privacy notices.

The Trust will only process personal data without consent where any of the above purposes cannot reasonably be achieved by other, less intrusive means or by processing less data.

Sensitive data will only be processed under the following conditions:

- Explicit consent of the data subject
- Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without consent.
- Processing relates to personal data manifestly made public by the data subject.
- Processing is necessary for:
 - Carrying out obligations under employment, social security or social protection law, or a collective agreement
 - Protecting the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent.
 - The establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity
 - Reasons of substantial public interest with a basis in law which is proportionate to the aim pursued and which contains appropriate safeguards
 - The purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services with a basis in law
- When none of the above apply, consent will be obtained by the data subject to the processing of their special category personal data.

For personal data to be processed fairly, data subjects must be made aware:

- That the personal data is being processed.
- Why the personal data is being processed.
- What the lawful basis is for that processing.

- Whether the personal data will be shared, and if so, with whom.
- The existence of the data subject's rights in relation to the processing of that personal data.
- The right of the data subject to raise a complaint with the ICO in relation to any processing.

There may be circumstances where it is considered necessary to process personal data or special category personal data in order to protect the vital interests of a data subject. This may include medical emergencies where it is not possible for the data subject to give consent to the processing. In such circumstances, the schools that form the Trust act as 'in loco parentis' and will provide information deemed necessary. At an appropriate point in time, the DPO will be notified that a school has exercised this right.

7. Consent

Consent must be a positive indication expressly confirmed in words. It cannot be inferred from silence, inactivity, a positive action without words or pre-ticked boxes.

Consent will only be accepted where it is freely given, specific, informed and an unambiguous indication of the individual's wishes. Consent can be withdrawn by the individual at any time.

Consent to process information is sought from parents/carers. In relation to staff, consent is sought at point of induction to the organisation. This consent deals with the taking and use of photographs and videos, amongst other things. Where appropriate, third parties may also be required to complete a consent form.

Where consent is given, a record will be kept documenting how and when consent was given, and what the data subject was told.

The Trust ensures that consent mechanisms meet the standards of the UK GDPR. Where the standard of consent cannot be met, an alternative legal basis for processing the data must be found, or the processing must cease. Consent accepted under the DPA will be reviewed to ensure it meets the standards of the UK GDPR; however, acceptable consent obtained under the DPA will not be reobtained.

8. The right to be informed

Adults and children have the same right to be informed about how the school uses their data. The privacy notices supplied to individuals, including children, in regard to the processing of their personal data will be written in clear, plain, age-appropriate language which is concise, transparent, easily accessible and free of charge.

In relation to data obtained both directly from the data subject and not obtained directly from the data subject, the following information will be supplied within the privacy notice:

- The identity and contact details of the controller (the Trust), and the DPO
- The purpose of, and the lawful basis for, processing the data
- The legitimate interests of the controller or third party
- Any recipient or categories of recipients of the personal data
- Details of transfers to third countries and the safeguards in place
- The retention period of criteria used to determine the retention period

- The existence of the data subject's rights, including the right to:
 - Withdraw consent at any time
 - Lodge a complaint with a supervisory authority

Where data is obtained directly from the data subject, information regarding whether the provision of personal data is part of a statutory or contractual requirement, as well as any possible consequences of failing to provide the personal data, will be provided – this information will be supplied at the time the data is obtained.

Where data is not obtained directly from the data subject, information regarding the categories of personal data that the school holds, the source that the personal data originates from and whether it came from publicly accessible sources, will be provided – this information will be supplied:

- Within one month of having obtained the data.
- If disclosure to another recipient is envisaged, at the latest, before the data are disclosed.
- If the data are used to communicate with the individual, at the latest, when the first communication takes place.

9. The right of access (Subject Access Request)

Individuals, including children, have the right to obtain a copy of their personal data as well as other supplementary information, including confirmation that their data is being processed, and the right to submit a subject access request (SAR) to gain access to their personal data in order to verify the lawfulness of the processing. The DPO will instruct that the school verify the identity of the person making the request before any information is supplied.

A copy of the information will be supplied to the individual free of charge; however, the Trust may impose a 'reasonable fee' to cover the administrative costs of complying with requests that are manifestly unfounded or excessive or if an individual requests further copies of the same information. Where a request is manifestly unfounded, excessive or repetitive, a reasonable fee will be charged. All fees will be based on the administrative cost of providing the information.

Where a SAR has been made electronically, the information will be provided in a commonly used electronic format.

Where a SAR has been made for information held about a child, the Trust will evaluate whether the child is capable of fully understanding their rights. If the school determines the child can understand their rights, it will respond in accordance with the views of the child.

All requests will be responded to without delay and at the latest, **within one month of receipt**. In the event of numerous or complex requests, the period of compliance will be extended by a further **two months**. The individual will be informed of this extension and will receive an explanation of why the extension is necessary, within one month of the receipt of the request.

Where a request is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

The Trust will ensure that information released in response to a SAR does not disclose personal data of another individual. If responding to the SAR in the usual way would disclose such data, the school will:

- Omit certain elements from the response if another individual's personal data would be disclosed otherwise.
- Reject requests that cannot be fulfilled without disclosing another individual's personal data, unless that individual consents or it is reasonable to comply without consent.
- Explain to the individual who made the SAR why their request could not be responded to in full.

In the event that a large quantity of information is being processed about an individual, the school will ask the individual to specify the information the request is in relation to – the time limit for responding to the request will be paused until clarification from the individual is received.

Under the Data (Use and Access) Act 2025, the Trust may also pause ("stop the clock") while seeking clarification from the requester. Searches must be reasonable and proportionate, and requests may be refused if they are vexatious, abusive or excessive. The Trust will inform individuals when clarification is required and when the response period resumes.

To process the request, we require the full name of the person making the request, their relationship to the individual (unless it is the individual making a request for their own data), contact details (home and email address) and a clear list of data they wish to request including what timeframe this would cover. A form is provided (appendix a), the Trust will still accept a request if not completed on the form, but it must include all of the above before it can be processed.

If the request is being made for a pupil in a secondary school, we will seek to obtain permission from the pupil, witnessed by a member of staff and ensuring that the pupil understands the nature of the request. The timeframe to respond will begin from the date that permission has been granted.

Data Protection Complaints Process

Individuals have the right to raise concerns or complaints about how the Trust processes their personal data. Under the Data (Use and Access) Act 2025, the Trust must operate a clear, accessible complaints process.

The Trust will:

- acknowledge complaints within 30 days
- investigate promptly, gathering relevant information
- provide a written outcome, explaining findings and actions taken
- inform individuals of their right to escalate to the ICO if they remain dissatisfied

All complaints will be logged and retained in accordance with the Trust's retention schedule.

10. The right to rectification

Individuals, including children, are entitled to have any inaccurate or incomplete personal data rectified.

Requests for rectification will be responded to within one month; this will be extended by two months where the request for rectification is complex.

Where the personal data in question has been disclosed to third parties, the Trust will inform them of the rectification where possible.

Where appropriate, the Trust will inform the individual about the third parties that the data has been disclosed to.

Where no action is being taken in response to a request for rectification, the Trust will explain the reason for this to the individual and will inform them of their right to complain to the ICO and to a judicial remedy.

11. The right to erasure

Individuals, including children, hold the right to request the deletion or removal of personal data in the following circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed
- When the individual withdraws their consent where consent was the lawful basis on which the processing of the data relied
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data is required to be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child

The Trust has the right to refuse a request for erasure where the personal data is being processed for the following reasons:

- To exercise the right of freedom of expression and information
- To comply with a legal obligation for the performance of a public interest task or exercise of official authority
- For public health purposes in the public interest
- For archiving purposes in the public interest, scientific research, historical research or statistical purposes
- The establishment, exercise or defence of legal claims

As a child may not fully understand the risks involved in the processing of data when consent is obtained, special attention will be given to existing situations where a child has given consent to processing and they later request erasure of the data, regardless of age at the time of the request.

Where personal data has been disclosed to third parties, they will be informed about the erasure of the personal data, unless it is impossible or involves disproportionate effort to do so.

Where personal data has been made public within an online environment, the school will inform other organisations who process the personal data to erase links to and copies of the personal data in question.

12. The right to restrict processing

Individuals, including children, have the right to block or suppress the school's processing of personal data. In the event that processing is restricted, the Trust will store the personal data, but not further process it, guaranteeing that just enough information about the individual has been retained to ensure that the restriction is respected in future.

The Trust will restrict the processing of personal data in the following circumstances:

- Where an individual contests the accuracy of the personal data, processing will be restricted until the Trust has verified the accuracy of the data
- Where an individual has objected to the processing and the school is considering whether their legitimate grounds override those of the individual
- Where processing is unlawful and the individual opposes erasure and requests restriction instead
- Where the Trust no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim

If the personal data in question has been disclosed to third parties, the school will inform them about the restriction on the processing of the personal data, unless it is impossible or involves disproportionate effort to do so.

The Trust will inform individuals when the a restriction on processing has been lifted.

13. The right to data portability

Individuals, including children, have the right to obtain and reuse their personal data for their own purposes from the Trust to another data controller in certain limited circumstances.

Personal data can be easily moved, copied or transferred from one ICT environment to another in a safe and secure manner, without hindrance to usability.

The right to data portability only applies in the following cases:

- Where personal data has been provided directly by an individual to a controller, and
- Where the processing is based on the individual's consent or for the performance of a contract, and
- When processing is carried out by automated means

Where the right to data portability is validly exercised, the relevant personal data will be provided to the other data controller in a structured, commonly used and machine-readable form.

The Trust will provide the information free of charge.

The Trust is not required to adopt or maintain processing systems which are technically compatible with other organisations.

In the event that the personal data concerns more than one individual, the Trust will consider whether providing the information would prejudice the rights of any other individual.

The Trust will respond to any requests for portability within one month. Where the request is complex, or a number of requests have been received, the timeframe can be extended by two months, ensuring that the individual is informed of the extension and the reasoning behind it within one month of the receipt of the request.

Where no action is being taken in response to a request, the Trust will, without delay and at the latest within one month, explain to the individual the reason for this and will inform them of their right to complain to the ICO and to a judicial remedy.

14. The right to object

The Trust will inform individuals, including children, of their right to object at the first point of communication, and this information will be outlined in the privacy notice and explicitly brought to the attention of the data subject, ensuring that it is presented clearly and separately from any other information.

Individuals, including children, have the right to object to the following:

- Processing based on legitimate interests or the performance of a task in the public interest.
- Processing used for direct marketing purposes.
- Processing for purposes of scientific or historical research and statistics.

Where personal data is processed for the performance of a legal task or legitimate interests:

- An individual's grounds for objecting must relate to his or her particular situation.
- The Trust will stop processing the individual's personal data unless the processing is for the establishment, exercise or defence of legal claims, or, where the school can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.
- The Trust will respond to objections proportionally, granting more weight to an individual's objection if the processing of their data is causing them substantial damage or distress.

Where personal data is processed for direct marketing purposes:

- The right to object is absolute and the Trust will stop processing personal data for direct marketing purposes as soon as an objection is received.
- The Trust cannot refuse an individual's objection regarding data that is being processed for direct marketing purposes.
- The Trust will retain only enough information about the individual to ensure that the individual's preference not to receive direct marketing is respected in future.

Where personal data is processed for research purposes:

- The individual must have grounds relating to their particular situation in order to exercise their right to object.
- Where the processing of personal data is necessary for the performance of a public interest task, the Trust is not required to comply with an objection to the processing of the data.

15. Data protection by design and default

The Trust will act in accordance with the UK GDPR by adopting a data protection by design and default approach and implementing technical and organisational measures which demonstrate how the Trust has considered and integrated data protection into all aspects of processing activities.

In line with the data protection by default approach, the Trust will ensure that only data that is necessary to achieve its specific purpose will be processed.

Data Protection Impact Assessments (DPIAs) will be used in certain circumstances to identify the most effective method of complying with the school's data protection obligations and meeting individuals' expectations of privacy.

DPIAs will allow the Trust to identify and resolve problems at an early stage, thus reducing associated costs and preventing damage from being caused to the school's reputation which might otherwise occur.

A DPIA will be carried out when using new technologies or when the processing is likely to result in a high risk to the rights and freedoms of individuals, and will be used for more than one project, where necessary.

The Data (Use and Access) Act 2025 updates the rules on automated decision-making (ADM). The Trust may use ADM where appropriate, provided that individuals receive meaningful human involvement, can challenge decisions, and can make representations. ADM safeguards must be documented and reviewed.

High risk processing includes, but is not limited to, the following:

- Systematic and extensive processing activities, such as profiling
- Large scale processing of special categories of data or personal data which is in relation to criminal convictions or offences
- The use of CCTV

The Trust will ensure that all DPIAs include the following information:

- A description of the processing operations and the purposes
- An assessment of the necessity and proportionality of the processing in relation to the purpose
- An outline of the risks to individuals
- The measures implemented in order to address risk

Where a DPIA indicates high risk data processing, the Trust may consult the ICO to seek its opinion as to whether the processing operation complies with the UK GDPR.

16. Data Breaches

The term 'personal data breach' refers to a breach of security which has led to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. All staff will be made aware of, and understand, what constitutes a data breach as part of their training.

Where the Trust faces a data security incident, the DPO will coordinate an effort to establish whether a personal data breach has occurred, assess the significance of any breach, and take prompt and appropriate steps to address it.

All notifiable breaches will be reported to the ICO within 72 hours of the Trust becoming aware of it. Where a breach is likely to result in a risk to the rights and freedoms of individuals, the ICO will be informed, and the individuals concerned will be contacted directly. A 'high risk' breach means that the threshold for notifying the individual is higher than that for notifying the ICO. The risk of the breach having a detrimental effect on the individual, and the need to notify the ICO, will be assessed on a case-by-case basis. In the event that a breach is sufficiently serious, the public will be notified without undue delay.

Within a breach notification to the ICO, the following information will be outlined:

- The nature of the personal data breach, including the categories and approximate number of individuals and records concerned
- The name and contact details of the DPO
- An explanation of the likely consequences of the personal data breach
- A description of the proposed measures to be taken to deal with the personal data breach
- Where appropriate, a description of the measures taken to mitigate any possible adverse effects

Where notifying an individual about a breach to their personal data, the Trust will provide specific and clear advice to individuals on the steps they can take to protect themselves and their data, where possible and appropriate to do so.

The Trust will ensure all facts regarding the breach, the effects of the breach and any decision-making processes and actions taken are documented in line with the UK GDPR accountability principle and in accordance with the Records Management Policy.

Failure to report a breach when required to do so may result in a fine, as well as a fine for the breach itself.

The Trust will work to identify the cause of the breach and assess how a recurrence can be prevented, e.g. by mandating data protection refresher training where the breach was a result of human error.

Where a potential breach has been identified, investigated and deemed not notifiable to the ICO, the DPO will inform the CEO and Chair of Trustees.

Where the Trust enters into an agreement with a third party which involves the processing of personal data be one party on behalf of the other (e.g. an outsourced services agreement or licence to use hosted software), the Trust will enter into a contract/data processing agreement

with the third party which imposes certain minimum data security obligations on the party processing the data.

Each arrangement should be reviewed by the DPO prior to commencement.

Personal data may only be transferred to a third-party processor if the processor agrees to comply with policy and procedures stated or puts in adequate measures itself.

17. Data Security

Confidential paper records will be kept in a locked filing cabinet, drawer or safe, with restricted access, and will not be left unattended or in clear view anywhere with general access.

Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed up **off-site**. The Trust's primary source of data storage is SharePoint and staff's own personal OneDrive. Memory sticks will not be used to hold personal information unless they are password protected and fully encrypted. All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the Trust enables electronic devices to allow the remote blocking or deletion of data in case of theft.

Where possible, staff will not use their personal laptops or computers for Trust purposes. All necessary members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

If staff need to use their personal laptops for school purposes, particularly if they are working from home, they will bring their device into school before using it for work to ensure the appropriate software can be downloaded and information encrypted.

Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients. When sending confidential information staff will always check that the recipient is correct before sending.

Before sharing data, all staff will ensure:

- They are allowed to share it.
- That adequate security is in place to protect it.
- Who will receive the data has been outlined in a privacy notice.

Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff will take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

The physical security of the school's buildings and storage systems, and access to them, is reviewed on a **termly** basis. If an increased risk in vandalism, burglary or theft is identified, extra measures to secure data storage will be put in place.

The Trust will regularly test, assess and evaluate the effectiveness of any and all measures in place for data security.

The Trust takes its duties under the UK GDPR seriously and any unauthorised disclosure may result in disciplinary action. The DPO is responsible for continuity and recovery measures are in place to ensure the security of protected data.

When disposing of data, paper documents will be shredded, and digital storage devices will be physically destroyed when they are no longer required. ICT assets will be disposed of in accordance with the ICO's guidance on the disposal of ICT assets.

The Trust holds the right to take the necessary disciplinary action against a staff member if they believe them to be in breach of the above security measures.

18. Safeguarding

The Trust understands that the UK GDPR does not prevent or limit the sharing of information for the purposes of keeping children safe.

The Trust will ensure that staff have due regard to their ability to share personal information for safeguarding purposes, and that fears about sharing information must not be allowed to obstruct the need to safeguard and protect pupils. The trustees will ensure that staff are:

- Confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- Aware that information can be shared without consent where there is good reason to do so, and the sharing of information will enhance the safeguarding of a pupil in a timely manner.

The Trust will ensure that information pertinent to identify, assess and respond to risks or concerns about the safety of a child is shared with the relevant individuals or agencies proactively and as soon as is reasonably possible. Where there is doubt over whether safeguarding information is to be shared, especially with other agencies, the DSL will ensure that they record the following information:

- Whether data was shared
- What data was shared
- With whom data was shared
- For what reason data was shared
- Where a decision has been made not to seek consent from the data subject or their parent
- The reason that consent has not been sought, where appropriate

The Trust will aim to gain consent to share information where appropriate; however, staff will not endeavour to gain consent if to do so would place a child at risk. The Trust will manage all instances of data sharing for the purposes of keeping a child safe in line with the Child Protection and Safeguarding Policy.

Pupils' personal data will not be provided where the serious harm test* is met. Where there is doubt, the school will seek independent legal advice.

19. Publication of Information

The Trust publishes a Freedom of Information Publication Scheme on its website outlining classes of information that will be made routinely available, including:

- Statutory Policies and procedures.
- Financial information.

Classes of information specified in the Freedom of Information Publication Scheme are made available quickly and easily on request.

The Trust will not publish any personal information, including photos, on its website without the permission of the affected individual. When uploading information to the school website, staff are considerate of any metadata or deletions which could be accessed in documents and images on the site.

20. CCTV and Photography

The Trust understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.

The Trust and its schools notifies all pupils, staff and visitors of the purpose for collecting CCTV images via notice boards, letters and email. Cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose. All CCTV footage will be kept for six months for security purposes; the Office Manager is responsible for keeping the records secure and allowing access.

Before the Trust is able to obtain the data of pupils or staff, it is required to give notification and obtain consent for this Special Category Data due to additional requirements for processing such data under the Protection of Freedoms Act 2012.

The Trust and its schools will always indicate its intentions for taking photographs of pupils and will retrieve permission before publishing them. If the Trust and its schools wishes to use images or video footage of pupils in a publication, such as the trust/school website, prospectus, or recordings of school plays, written permission will be sought for the particular usage from the parent of the pupil.

Images captured by individuals for recreational or personal purposes, and videos made by parents for family use, are exempt from the UK GDPR.

Parents and others attending school events are able to take photographs and videos of those events as long as they are for domestic purposes only. Photographs or videos being used for any other purpose are prohibited to be taken by parents or visitors to the school.

The school asks that parents and others do not post any images or videos which include any children other than their own on any social media or otherwise publish those images or videos.

21. Cloud Computing

For the purposes of this policy, '**cloud computing**' refers to storing and accessing data and programs, such as documents, photos or videos, over the internet, rather than on a device's

hard drive. Cloud computing involves the school accessing a shared pool of ICT services remotely via a private network or the internet.

All staff will be made aware of data protection requirements and how these are impacted by the storing of data in the cloud, including that cloud usage does not prevent data subjects from exercising their data protection rights.

If the cloud service offers an authentication process, each user will have their own account. A system will be implemented to allow user accounts to be created, updated, suspended and deleted, and for credentials to be reset if they are forgotten, lost or stolen. Access for employees will be removed when they leave the school.

All files and personal data will be encrypted before they leave a school device and are placed in the cloud, including when the data is 'in transit' between the device and cloud. A robust encryption key management arrangement will be put in place to maintain protection of the encrypted data. The loss of an encryption key will be reported to the DPO immediately; failure to do so could result in accidental access or destruction of personal data and, therefore, a breach of the relevant data protection legislation.

As with files on school devices, only authorised parties will be able to access files on the cloud. An audit process will be put in place to alert the school should unauthorised access, deletion or modification occur, and ensure ongoing compliance with the school's policies for the use of cloud computing.

The school's usage of cloud computing, including the service's security and efficiency, will be assessed and monitored by the DPO. The DPO will also ensure that a contract and data processing agreement are in place with the service provider, confirming compliance with the principles of the UK GDPR and DPA. The agreement will specify the circumstances in which the service provider may access the personal data it processes, such as the provision of support services.

The DPO will also:

- Ensure that the service provider has completed a comprehensive and effective self-certification checklist covering data protection in the cloud.
- Ensure that the service provider can delete all copies of personal data within a timescale in line with the school's Data Protection Policy.
- Confirm that the service provider will remove all copies of data, including back-ups, if requested.
- Find out what will happen to personal data should the school decide to withdraw from the cloud service in the future.
- Assess the level of risk regarding network connectivity and make an informed decision as to whether the school is prepared to accept that risk.
- Monitor the use of the school's cloud service, with any suspicious or inappropriate behaviour of pupils, staff or parents being reported directly to the headteacher

22. Data Retention

Data will not be kept for longer than is necessary. Unrequired data will be deleted as soon as practicable. Some educational records relating to former pupils or employees of the school may be kept for an extended period for legal reasons, but also to enable the provision of references or academic transcripts. Paper documents will be shredded or pulped, and electronic memories scrubbed clean or destroyed, once the data should no longer be retained.

23. DBS data

All data provided by the DBS will be handled in line with data protection legislation; this includes electronic communication. Data provided by the DBS will never be duplicated. Any third parties who access DBS information will be made aware of the data protection legislation, as well as their responsibilities as a data handler.

24. Monitoring and Review

This policy is reviewed annually by the DPO or sooner if necessary.

**the Serious Harm Test will be directed by the DPO and undertaken by the Trust Safeguarding Lead, school Designated Safeguarding Lead and Headteacher.*

PART 2 — RECORDS MANAGEMENT & DOCUMENT RETENTION POLICY

27. Purpose

The Trust is responsible for creating, maintaining, storing and disposing of records in a way that meets legal requirements, supports operational needs and protects individuals' rights. This Records Management & Document Retention Policy sets out how the Trust ensures that information is retained only for as long as necessary, stored securely, and disposed of appropriately. It provides a consistent framework for all academies and central teams, ensuring compliance with UK GDPR, the Data Protection Act 2018, the Limitation Act 1980, the Academy Trust Handbook, and sector guidance such as the IRMS Toolkit for Schools.

The policy supports effective governance, safeguarding, financial accountability, HR management, and statutory reporting, and ensures that records are handled in a way that upholds confidentiality, integrity and availability.

28. Scope

This policy applies to all Trust schools, central functions, staff, governors, trustees, volunteers and contractors. It covers all forms of information, including paper files, digital documents, audio-visual material, cloud-stored data, and records held within systems such as SharePoint, Arbor, HR platforms, finance systems and safeguarding software.

The policy governs the full lifecycle of records, including their creation, active use, storage, retention, archiving and disposal. It applies equally to administrative, educational, safeguarding, HR, financial and governance records.

29. Roles and Responsibilities

Effective records management requires clear responsibilities across the Trust.

The Trust Board approves this policy and ensures that the organisation meets statutory and regulatory requirements.

The CEO and Executive Team oversee implementation and ensure that schools and central teams have the resources and systems needed to comply with retention and disposal requirements.

The Data Protection Officer (DPO) provides expert advice, monitors compliance, supports schools with implementation, and ensures that retention and disposal practices align with UK GDPR principles, particularly storage limitation and data minimisation.

Headteachers, Office Managers and administrative staff are responsible for maintaining accurate records, applying retention periods, digitising HR files, preventing unlawful retention, and ensuring secure disposal of expired documents.

All staff must follow retention rules, store records securely, avoid unnecessary duplication, and report any concerns to the DPO.

30. Retention Principles

The Trust follows a set of core principles to ensure that records are managed lawfully and effectively.

Personal data must only be retained for as long as it is needed for its original purpose. Records that have passed their retention period must be securely destroyed and must not be scanned, digitised or archived. The Trust prioritises digital storage through SharePoint and Arbor, reducing reliance on paper files and ensuring consistent access controls.

Records must be accurate, complete and stored securely. Sensitive information, including safeguarding and HR records, must be held with strict access controls. Duplication should be avoided, particularly where Arbor already stores the required information.

Retention periods are based on statutory requirements, sector guidance, safeguarding legislation, financial regulations and the Limitation Act 1980. Where no statutory period exists, the Trust applies reasonable retention periods aligned with best practice.

Under the Data (Use and Access) Act 2025, the Trust must maintain a Data Protection Complaints Log as part of its accountability obligations. This log must record the date a complaint is received, the acknowledgement date, investigation steps, outcome, and whether the statutory 30-day requirement was met. The log must be retained in accordance with the Trust's retention schedule.

31. Trust-Wide Retention Schedule

The following tables set out the Trust's retention periods for all major categories of records. Each table includes the retention period, legal or regulatory basis, and any relevant notes.

C = *Current year* (the academic year or financial year in which the record is created or closed)

32. Staff Personal File Retention

The Trust is committed to maintaining secure, accurate and compliant HR records. All personal files must be digitised and stored within the Trust's SharePoint HR library. Before scanning any document, staff must check the relevant retention period to ensure expired records are not digitised or retained.

Paper documents must be shredded once digitisation is complete. Records already held in Arbor, such as sickness absence dates, must not be duplicated in personal

files. This approach ensures compliance with UK GDPR principles of accuracy, minimisation and storage limitation.

Documents that have passed their retention period must be destroyed immediately.

Privacy notices and HR documentation must reflect the Trust's Data Protection Complaints Process, recognised legitimate interests, and the SAR stop-the-clock provisions introduced by the Data (Use and Access) Act 2025.

33. Digitisation & Shredding Requirements

Digitisation is a core component of the Trust's records management approach. All HR files must be transferred to SharePoint, ensuring secure access controls and consistent storage across the Trust. Expired documents must never be scanned or uploaded and must be shredded securely.

This process reduces risk, prevents unlawful retention, and ensures that personal data is stored in a secure, centralised system.

35. Secure Disposal

All records must be disposed of securely and irreversibly. Acceptable methods include cross-cut shredding, secure waste collection, secure digital deletion, and removal from backups where appropriate. Disposal must be confidential and compliant with ICO guidance.

Where required, disposal activities should be logged to maintain an audit trail.

36. Monitoring & Review

The Trust will review this policy annually or sooner if required by legislative changes. Compliance will be monitored through audits, training, and oversight by the DPO. Schools and central teams must ensure that retention schedules are followed consistently and that expired records are disposed of securely.

Monitoring will include review of the Data Protection Complaints Log and compliance with the DUAA 2025 requirements relating to SAR clarification pauses, ADM safeguards, and accountability documentation

Appendix One – Retention Schedule

Where an entry is marked with this symbol ▲, consideration should be given to the potential for legal challenges. Where a legal challenge is possible or pending at the end of the initial retention period, records may be retained for an additional six years, in line with the Limitations Act 1980.

Pupil Records

Records in this section contain those that the Department for Education (DfE) considers as part of a pupil's file. Please refer to the 'Safeguarding and Child Protection Records' section for retention periods relating to safeguarding.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Primary school pupil file	Yes	Until the pupil leaves the school.	Statutory	The Education (Pupil Information) (England) Regulations 2005	Securely transfer to the onward setting.
Secondary school pupil file	Yes	Until the pupil's 25th birthday. (18 + 6 years as an adult)	Statutory	The Education (Pupil Information) (England) Regulations 2005 Limitations Act 1980	Secure disposal If a pupil leaves, transfer the records to the onward setting
Formal academic attainment (e.g. coursework/ exam results)	Yes	Subject to the pupil file retention.	Statutory	The Education (Pupil Information) (England) Regulations 2005	Secure disposal May wish to anonymise and retain results for comparison purposes
Pupil work (e.g. exercise books, homework, learning app data, etc.)	Yes	Given to pupils at the end of each year. Where not possible, retain for the current year + 1.	Business Need		Secure disposal

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Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Special educational needs and disabilities (SEND)  (Inc. reviews and education, health, and care (EHC) plans)	Yes	End of EHCP + 6 years or until the pupil's 25th birthday.	Statutory	The Special Educational Needs and Disability Regulations 2014	Secure disposal If a pupil leaves, transfer the records to the onward setting
Personal Education Plans (PEPS) (For looked after children)	Yes	Date of birth of the pupil + 25 years.	Statutory	Children and Young Persons Act 2008 Children and Social Work Act 2017	Secure disposal
Medical administration records 	Yes	Retained in pupil file or until the pupil's 25 th birthday.	Best Practice	NHS Records Management Code of Practice	Secure disposal

Safeguarding and Child Protection Records

Records in this section relate to safeguarding and child protection matters.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Primary school safeguarding & child protection files 	Yes	Until the pupil leaves the school.	Statutory	The Education (Pupil Information) (England) Regulations 2005. DfE Keeping Children Safe in Education	Securely transfer to the onward setting as a separate file or in a sealed envelope within the pupil's file
Secondary school safeguarding & child protection files 	Yes	Until the pupil's 25th birthday. (18 + 6 years as an adult)	Statutory	The Education (Pupil Information) (England) Regulations 2005 DfE Keeping Children Safe in Education	Secure disposal
Child sexual abuse files 	Yes	Until the child's 75th birthday.	Statutory	The Report of the Independent Inquiry into Child Sexual Abuse (IICSA) recommendation on access to records	We expect this information to be held by the Local Authority as the lead. If this is not the case, records should be held by the final school setting
Allegations concerning child protection against a member of staff (including unfounded) 	Yes	Until the staff member's normal retirement age, or 10 years from the date of the allegation, whichever is later.	Statutory	DfE Keeping Children Safe in Education	Secure disposal

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Complaints: negligence or safeguarding 	Yes	Date the complaint resolved + 15 years.	Best Practice		Secure disposal
Complaints: child sexual abuse 	Yes	Date the complaint resolved + 75 years.	Best Practice		Secure disposal

Staff and HR Information

This section relates to data held about staff members. Where records are retained for a business need, please ensure you review the suggested retention period and amend it as required to meet your school or Trust's requirements.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Personnel files	Yes	Termination date + 6 years	Statutory	Limitations Act 1980	Secure disposal
Appraisal records	Yes	Current year + 6 years	Business Need		Secure disposal
Professional development plans	Yes	Life of the plan + 6 years	Business Need		Secure disposal
Timesheets & pay records	Yes	End of the tax year + 3 years.	Statutory	PAYE and payroll for employers: Keeping records	Secure disposal
Maternity pay records	Yes	End of the tax year + 3 years.	Statutory	The Statutory Maternity Pay (General) Regulations 1986	Secure disposal
Sickness and leave of absence records	Yes	Current year + 3 years.	Best Practice		Secure disposal
Retirement benefits	Yes	End of the year in which the accounts were signed + 6 years.	Statutory	Retirement Benefits Schemes (Information Powers) Regulations 1995	Secure disposal
Appointment of Headteacher records	Yes	Date of appointment + 6 years.	Best Practice		Secure disposal

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Successful candidates	Yes	Relevant information added to HR file, all other information held for date of appointment + 6 months.	Business Need		Secure disposal
Unsuccessful candidates	Yes	Date of appointment + 6 months.	Best Practice		Secure disposal
Copies of DBS certificates	Yes	Date of appointment + 6 months.	Statutory	DfE Keeping Children Safe in Education	Secure disposal
Pre-employment vetting information (Evidence proving the right to work in the United Kingdom)	Yes	Termination date + 2 years.	Statutory	An employer's guide to right to work checks [Home Office May 2015] Last updated 27 April 2022	Secure disposal
Access to work documentation	Yes	As per funding requirements, or in line with the Limitations Act.	Statutory	Limitations Act 1980	Secure disposal
Supply and agency staff	Yes	Date last worked in school + 6 years.	Best Practice		Secure disposal
Volunteers	Yes	Date last worked in school + 3 years.	Best Practice		Secure disposal
Governor/ trustee personnel file (including parent governors)	Yes	End of appointment + 6 years.	Statutory	Companies Act 2006	Secure disposal

School Operations and Governance

This section relates to the operational running and governance of schools and Trusts.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Attendance records	Yes	Register – Date of entry + 6 years. Back-up – End of school year + 6 years.	Statutory	School Attendance (Pupil Registration) (England) Regulations 2024	Secure disposal
Admissions data	Yes	Date of admission + 6 years.	Statutory	School Attendance (Pupil Registration) (England) Regulations 2024	Consider for permanent preservation
Unsuccessful admission applications	Yes	Resolution of case + 1 year.	Statutory	School Admissions Code.	Secure disposal
School trips	Yes	Date of visit + 6 years. If an incident occurred, retain permission slips & incident report in the pupil file.	Best Practice	Health and safety on educational visits	Secure disposal
Consent forms (e.g school trip or photo consent)	Yes	Current year + 1 year.	Business Need		Secure disposal
List of pupils on free school meals	Yes	Current financial year + 3 years.	Business Need		Secure disposal
Photographs and videos – internal use (displays, ID, pupil work, etc.)	Yes	Current year + 1 year.	Business Need		Given to the pupil or secure disposal

Photographs and videos – external use (publications, marketing, social media etc.)	Yes	Current year + 3 years.	Business Need		Consider for permanent preservation
Annual governors' report	Possibly	Date of report + 10 years.	Statutory	The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002	Secure disposal
Governing board meeting minutes (maintained schools)	Yes	Principal set (signed) – retain for historical interest. Other copies - date of meeting + 3 years.	Business Need		Principal set - offer to archives Other copies - secure disposal
Trustee meeting minutes (Academy Trust)	Yes	Principal set (signed) – retain for historical interest. Other copies - date of meeting + 10 years.	Statutory	Companies Act 2006	Principal set - offer to archives Other copies - secure disposal
Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Memoranda of understanding	No	Life of the academy + 6 years.	Statutory	Companies Act 2006	Routine disposal
Complaint files	Yes	Date complaint resolved + 3 years.	Business Need		Secure disposal
Curriculum records	No	Current year + 1 year.	Statutory	Education (Pupil Information) (England) Regulations 2005	Routine disposal

Directors – disqualification (Academy Trust)	Yes	Date of disqualification + 15 years.	Statutory	The Education (Company Directors Disqualification Act 1986: Amendments to Disqualification Provisions) (England) Regulations 2004	Secure disposal
School vehicles	No	Vehicle disposal + 6 years.	Statutory	Limitations Act 1980	Routine disposal
Ofsted reports	No	Life of the report then review.	Business Need		Routine disposal
Policy documents	No	Until superseded + 3 years.	Business Need		Routine disposal
E-monitoring data	Yes	Non-actionable notifications + 1 month. Actionable notifications – retained in pupil or personnel file or with safeguarding records.	Business Need		Secure disposal
Visitor management	Yes	Academic year + 1 year.	Business Need		Secure disposal
Surveillance system footage (CCTV)	Yes	Date of recording + 30 days unless required for an investigation or access request.	Business Need		Secure disposal

Health and Safety

These records relate to the statutory health and safety obligations of the school or Trust.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Accessibility plans	Yes	Life of plan + 6 years.	Statutory	Limitations Act 1980	Secure disposal
Accident records	Yes	Date of accident + 3 years. (Serious accidents involving pupils should be retained in the pupil file).	Statutory	Social Security (Claims and Payments) Regulations 1979	Secure disposal
Risk assessments (for substances hazardous to health)	No	Date of assessment + 5 years.	Statutory	The Control of Substances Hazardous to Health Regulations 2002	Routine disposal
Health surveillance records (inc. exposure to hazardous substances)	Yes	Date of record + 40 years.	Statutory	The Control of Substances Hazardous to Health Regulations 2002	Secure disposal
Other staff health records	Yes	Held in line with the staff personnel file.	Statutory	HSE guidance on health surveillance - record keeping	Secure disposal
Fire assessments	No	Life of the risk assessment + 6 years.	Statutory	Fire Service Order 2005	Secure disposal

Property and Finance

Records in this section refer to the property, contracts, or financial transactions. Please ensure adherence to the correct retention period, as specified in the contract or funding agreement, where a longer retention period is required.

Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Maintenance records	No	End of year + 6 years.	Statutory	Record keeping (VAT Notice 700/21)	Routine disposal

Title deeds	No	End of deed + 12 years.	Statutory	Limitations Act 1980	Routine disposal
Contracts	No	Contract end + 6 years.	Statutory	Limitations Act 1980	Routine disposal
Information Asset Name	Personal data	Retention Period	Basis	Reference	Action or disposal method
Debtor's records	Yes	End of financial year + 6 years.	Statutory	Limitations Act 1980	Secure disposal
Petty cash	No	End of financial year + 6 years.	Statutory	Limitations Act 1980	Routine disposal
VAT records	No	End of financial year + 6 years.	Statutory	Record keeping (VAT Notice 700/21)	Routine disposal

