



THE NORTON
KNATCHBULL
SCHOOL

Things done well make the best memories
SIR NORTON KNATCHBULL – 1637

Data Retention Policy

Policy Owner	Ben Greene, Headteacher
Policy reviewed by	Judicium, DPO
EIA	Lena Seed, Governance & Compliance Professional
Delegated authority	Finance & General Purposes Committee
Approved by Finance & General Purposes Committee	30 th January 2026
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Data Retention Policy

The School has a responsibility to maintain its records and record keeping systems. When doing this, the School will take account of the following factors:

- The most efficient and effective way of storing records and information;
- The confidential nature of the records and information stored;
- The security of the record systems used;
- Privacy and disclosure; and
- Accessibility of records and record keeping systems.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It does, however, reflect the School's current practice, the requirements of current legislation and best practice and guidance. It may be amended by the School from time to time and any changes will be notified to employees within one month of the date on which the change is intended to take effect. The School may also vary any parts of this procedure, including any time limits, as appropriate in any case.

Data Protection

This policy sets out how long employment-related and pupil data will normally be held by the School and when that information will be confidentially destroyed in compliance with the terms of the UK General Data Protection Regulation (UK GDPR) and the Freedom of Information Act 2000.

Data will be stored and processed to allow for the efficient operation of the School. The School's Data Protection Policy outlines its duties and obligations under the UK GDPR.

Retention Schedule

Information (hard copy and electronic) will be retained for at least the period specified in the attached retention schedule. When managing records, the School will adhere to the standard retention times listed within that schedule.

The retention schedule refers to all records regardless of the media (e.g., paper, electronic, microfilm, photographic etc) in/on which they are stored. All records will be regularly monitored by the School's Data Lead the Network Manager.

Destruction of Records

The schedule is a relatively lengthy document listing the many types of records used by the School and the applicable retention periods for each record type. The retention periods are based on business needs and legal requirements.

Where records have been identified for destruction, they should be disposed of in an appropriate way. All information must be reviewed before destruction to determine whether there are special factors that mean destruction should be delayed, such as potential litigation, complaints or grievances.

All paper records containing personal information or sensitive policy information should be shredded before disposal where possible. All other paper records should be disposed of by an appropriate wastepaper merchant. All electronic information will be deleted.

The School maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in the following Document: [Date Destruction Log.xlsx](#)

Retention of Safeguarding Records

Any allegations made that are found to be malicious must not be part of the personnel records.

For any other allegations made, the School must keep a comprehensive summary of the allegation made, details of how the investigation was looked into and resolved and any decisions reached. This should be kept on the personnel files of the accused.

Any allegations made of sexual abuse should be preserved by the School for the term of an inquiry by the Independent Inquiry into Child Sexual Abuse. All other records (for example, the personnel file of the accused) should be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. In 2022 the Independent Inquiry into Child Sexual Abuse (IICSA) concluded and published their final report, leaving a recommendation that all records relating to child sexual abuse should be retained for a period of 75 years.

The ICO has not currently produced guidance or frameworks regarding retention as recommended by the inquiry. Until this has been produced, records will still be retained for a prolonged period as recommended initially by IICSA in order to fulfil potential legal duties that a school may have in relation to the inquiry or any further guidance.

Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by the school's Data Lead. The appropriate staff member, when archiving documents should record in this list the following information: -

- File reference (or other unique identifier);
- File title/description;
- Number of files; and
- Name of the authorising officer.

Transferring Information to Other Media

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

Pupil Records

All schools with the exception of independent schools, are under a duty to maintain a pupil record for each pupil.. We retain the pupil's record whilst the child remains at the School. If a pupil leaves before the end of 6th form, the file will be sent to their next school. The responsibility for retention then shifts onto the next school.

We may delay destruction for a further period where there are special factors such as potential litigation.

Responsibility and Monitoring

The Data Lead has primary and day-to-day responsibility for implementing this policy. The Data Protection Officer, in conjunction with the School is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The Data Protection Officer will consider the suitability and adequacy of this policy and report improvements directly to management.

Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Emails

The school's email retention policy is 3 years, after which all emails are automatically deleted. Emails accounts should not be used as a file/case management tool in itself. Generally, emails may need to fall under different retention periods (for example, an email regarding a health and safety report will be subject to a different time frame to an email which forms part of a pupil record). It is important to note that the retention period will depend on the content of the email and it is important that staff file those emails in the relevant areas to avoid the data becoming lost.

Data Lead

The schools Data lead is: Lena Seed, lseed@nks.kent.sch.uk

Retention Schedule

The school's retention schedule and responsible persons are available here:

[Retention schedule.xlsx](#)

NKS – Equality Impact Assessment (EIA)

The purpose of an Equality Impact Assessment (EIA) is to ensure that policies, procedures, or decisions do not create unnecessary barriers for individuals with protected characteristics under the Equality Act 2010. Where potential negative impacts are identified, these should be eliminated or minimised, and opportunities for positive impact should be considered.

POLICY STATUS

Update of existing policy

THIS POLICY WILL AFFECT

- Staff
 - Students
 - Teachers
 - Parents
-

EIA completed by

Lena Seed, Governance & Compliance Professional

Contributors to EIA: None

Date completed: January 2026

(This EIA has been reviewed and confirmed as current at the point of policy approval.)

IMPACT ANALYSIS

Protected characteristic	Positive impact	Neutral impact	Negative impact	Why will the policy have this effect?
Sex	✓			<i>The policy applies consistent retention and destruction rules to all personal data regardless of sex, ensuring fairness and compliance with UK GDPR principles.</i>
Race	✓			<i>Clear retention limits and secure destruction reduce the risk of inappropriate long-term storage or misuse of personal data across all racial and ethnic groups.</i>
Religion or belief	✓			<i>Where religious belief constitutes special category data, the policy ensures enhanced safeguards and proportionate retention in line with statutory requirements.</i>
Sexual orientation	✓			<i>Sexual orientation data is treated as special category data and benefits from strict access controls and defined retention periods.</i>

Protected characteristic	Positive impact	Neutral impact	Negative impact	Why will the policy have this effect?
Gender reassignment	✓			<i>The policy supports dignity and privacy by limiting how long highly sensitive personal data is retained and ensuring secure disposal.</i>
Pregnancy or maternity	✓			<i>Employment and leave-related records are retained only for lawful and necessary periods, supporting privacy while meeting statutory obligations.</i>
Age	✓			<i>The policy includes clear provisions for pupil records, safeguarding records, and extended retention where required to protect children and young people.</i>
Disability	✓			<i>Health and disability-related records are handled in line with special category data requirements, with safeguards to prevent unnecessary or excessive retention.</i>
Marriage or civil partnership		✓		<i>This characteristic is not directly engaged by retention decisions and is not used to differentiate how records are managed.</i>

Other relevant groups (non-protected characteristics)

- English as an additional language
- Looked-after children
- Families with separated parents

Impact: Positive

Clear retention rules, safeguarding provisions, and lawful sharing arrangements support transparency and protect the rights of vulnerable pupils and families.

INTERSECTIONAL IMPACT

No adverse intersectional impacts have been identified.

The policy applies uniformly and includes professional oversight to ensure that individuals with multiple protected characteristics are not disadvantaged.

OUTCOMES

CONSULTATION AND STAKEHOLDER ENGAGEMENT

No specific stakeholder consultation was required due to the statutory and procedural nature of the policy.

The policy reflects legal obligations under UK GDPR and safeguarding legislation and has been reviewed by the School's Data Protection Officer.

FINAL DECISION ON POLICY

The policy does not require revision as a result of this Equality Impact Assessment.

MONITORING ARRANGEMENTS

Revisions to data protection legislation, safeguarding guidance, ICO advice, and best practice are monitored by the Data Protection Officer and advised to the school. Where changes are identified, the policy and associated retention schedule will be reviewed accordingly.