



Data Retention and Records Management Policy

1. Purpose

This policy sets out how Meadow Learning CIC (The Meadow) creates, stores and looks after its records, how long each type of record is kept, and how records are disposed of securely. It supports our Data Protection Policy and the UK GDPR principle that personal data is kept no longer than necessary.

2. Responsibilities

- **Claire Imhasly (Manager, Director and Data Protection Lead)** is responsible for records management and for this policy.
- **Bon O'Hara (Designated Safeguarding Lead)** is responsible for safeguarding and child protection records.
- All staff and volunteers keep records accurate, store them only in the approved places below, and never keep personal data longer than this policy allows.

3. Where records are kept

Record type	Where it is kept	Who can access it
Electronic records (registration, attendance, medical, incident, placement and staff records)	Folders in The Meadow's Google Drive	Directors only. Staff may be given access to a specific file they need, by name, never by public link.
Email	The Meadow's Gmail account	Directors only
Day-to-day messages with families	WhatsApp, on phones protected by a screen lock	Staff in the relevant group. No medical, special needs or safeguarding information is sent by WhatsApp.
Safeguarding and child protection records	A separate restricted Google Drive folder	The DSL and the Manager only
Paper records (session register, emergency contacts and medical information for the day)	In locked storage at the hall or at a director's home; with a member of staff during sessions	Directors and session staff

4. Managing records

- Records are named clearly and filed in the agreed folders so they can be found, kept up to date and deleted on time.
- We keep one master copy of each record. Personal data is not saved to personal devices or personal cloud accounts, and downloads are deleted once used.

- Paper records are kept to a minimum and are scanned into Google Drive where they need to be kept.
- Each September the Manager reviews all records against the schedule below and securely destroys anything that is due. Safeguarding records are reviewed by the DSL.

5. Retention schedule

Record	How long we keep it	Then
Family Agreement, registration and contact details	While the young person attends, then 1 year after they leave	Delete / shred
Attendance registers	3 years after the end of the academic year	Delete / shred
Commissioned placement records (referral, agreement, attendance reports, progress reports, correspondence)	6 years after the placement ends	Delete / shred
Safeguarding and child protection records	When the young person leaves, the DSL sends the file securely to the commissioning school's DSL (or the young person's school) within 5 school days. Our copy is kept securely until the young person's 25th birthday	Delete / shred, and log the destruction
Accident and incident records involving young people	Until the young person's 21st birthday (25th if there is a safeguarding element)	Delete / shred
Medication administration records	Until the young person's 21st birthday	Delete / shred
Individual healthcare plans	While the young person attends, then 1 year after they leave	Delete / shred
Behaviour records with no safeguarding element	While the young person attends, then 1 year after they leave	Delete / shred
Photographs and videos of young people	While consent is in place; deleted when consent is withdrawn or within 1 year of the young person leaving. Images already published are removed from our website and social media on request where possible	Delete
Complaints	6 years after the complaint is closed	Delete / shred
Allegations against staff or volunteers (other than malicious ones)	Until the person's normal pension age, or 10 years from the date of the allegation, whichever is longer (Keeping Children Safe in Education). Malicious allegations are removed from personnel records	Delete / shred
Staff and volunteer personnel records	7 years after they leave	Delete / shred
Recruitment records for unsuccessful applicants	6 months after the decision	Delete / shred
DBS checks	Certificate number, date and outcome recorded on the staff record. Copies of certificates are not kept for longer than 6 months	Delete / shred copies
Financial records (invoices, payments, payroll, accounts)	6 years after the end of the financial year	Delete / shred
Employers' liability insurance certificates	40 years	Delete / shred
Health and safety risk assessments	3 years after they are replaced	Delete / shred

Emails and WhatsApp messages containing personal data	Only as long as the record they relate to. WhatsApp family groups are cleared at the end of each academic year	Delete
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Where a record is needed for a legal claim, an investigation or a safeguarding enquiry, it is kept until that has finished, even if its retention period has passed.

6. Secure disposal

- **Paper:** cross-cut shredded.
- **Google Drive and Gmail:** deleted and then removed from the Bin / Trash so they cannot be recovered.
- **WhatsApp:** chats and media deleted from the devices concerned.
- **Devices:** before a computer, phone or storage device is disposed of or passed on, it is signed out of all Meadow accounts and factory reset (modern devices are encrypted, so a reset makes the data unreadable), or it is destroyed through a certified recycler.
- A short log is kept of the destruction of safeguarding records.

7. Review

This policy is reviewed every year by the Data Protection Lead, and whenever the law or guidance changes.

8. Contact

Claire Imhasly, Data Protection Lead · themeadowbath@gmail.com · 07411 865399

Reviewed: October 2026 · **Approved by:** the Directors of Meadow Learning CIC · **Next review:** October 2027, or sooner if law or guidance changes