



BLEND YOUTH PROJECT

DATA RETENTION & DELETION POLICY

OCTOBER 2025

1. Purpose

This policy sets out the approach Blend Youth Project (BYP) takes to the retention, storage, review, and deletion of all records and personal data. It ensures compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), Keeping Children Safe in Education (KCSIE), Working Together to Safeguard Children, NSPCC guidance, Charity Commission expectations, and relevant safeguarding legislation.

2. Principle

BYP adheres to the following principles:

- Personal data must be retained only for as long as necessary.
- Safeguarding considerations always take precedence over data protection concerns.
- Records must be stored securely and disposed of confidentially.
- Retention must consider legal requirements, good practice, and future liability.

3. Meaning of 'Record'

For the purpose of this policy, a 'record' means any document or data, in electronic or paper form, containing information relating to BYP activities, staff, volunteers, or young people.

4. Secure Storage and Disposal

Records must be stored securely. When disposal is required, confidential waste processes must ensure data cannot be read, reconstructed, or retrieved. Third-party disposal partners must be licenced and meet BYP's security expectations.

5. Safeguarding Records

In line with national inquiry findings and safeguarding legislation, BYP may retain safeguarding records indefinitely where required for duty of care, historical reference, or potential future disclosures or claims.

6. Retention Schedule

The table below outlines minimum retention periods. BYP may extend retention where safeguarding considerations apply.

Record Type	Minimum Retention Period
Registration documents	Permanent or until closure.
Attendance registers	6 years from last entry.
Trustee meeting minutes	6 years.
Admissions records	25 years from DOB.
Pupil files, reports, medical records	25 years from DOB (or longer for safeguarding).
Safeguarding files	Indefinitely.

DBS certificates	No longer than 6 months (record of checks kept permanently).
Accident/incident reports	25 years from DOB for children; 4+ years for staff.
Employment contracts & personnel files	7 years from end of employment.
Payroll and salary records	6 years.
Insurance documents	Duration of policy plus run-off plus claim window.

7. Review of Records

Where practical, BYP will review records to ensure they remain necessary, relevant, and lawfully held. Certain categories (e.g., safeguarding) may be retained without scheduled review due to legal or safety considerations.

8. Roles and Responsibilities

The Designated Safeguarding Leads (DSL), Data Protection Lead (DPL), and Trustees share responsibility for ensuring compliance with this policy. Staff and volunteers must follow retention and disposal practices.

9. Policy Review

This policy will be reviewed annually or earlier if legislation or guidance changes.