





NEWMAN CATHOLIC TRUST

HEART SPEAKS TO HEART

Trust Retention Policy 2025-26

Review Cycle	Date of Policy	Reviewed by	Review Date
Annual	April 25	Board	April 26

Ratification

Role	Name	Signature	Date
Chair of Board	Chris Izuka		April 25
CEO	Dr Daniel Doyle		April 25

Commitment to Equality:

The Trust and its schools are committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard.

"Rooted in faith, we ignite a love of learning, foster inclusive education and empower every individual to achieve their utmost potential."

At the Newman Catholic Trust, we stand united in our unwavering mission to nurture a transformative educational experience, where every child is seen, valued and cherished as a unique gift from God. Rooted in faith, we ignite a love for learning that awakens curiosity, sparks imagination and fuels a lifelong journey of discovery.

Guided by the teachings of Christ and inspired by the profound wisdom of our namesake, Saint John Henry Newman, we strive to foster a community where inclusion is lived, diversity is embraced and every individual is empowered to fulfil their highest potential. As Newman said, *"To live is to change, and to be perfect is to have changed often."* We believe that education is a sacred journey of continual transformation—intellectually, spiritually and personally. We believe that true education is not just about knowledge, but about shaping hearts and minds, cultivating resilience and nurturing the whole person.

Our vision is simple yet profound: to be a beacon of hope and excellence, where students are not only academically accomplished but spiritually enriched and personally empowered to make a difference in the world. In all that we do, we strive to embody our core values:

- **Christ/Child Centred:** Placing the Gospel values, the teachings of Christ and the well-being of each child at the heart of every action we take.
- **Inclusive and Consultative:** Ensuring open communication and engagement with all members of our community.
- **Caring:** Showing empathy, understanding and support in navigating any challenges that may arise.
- **Transparent:** Fostering openness and honesty in all our interactions.
- **Strategic:** Approaching all matters with careful planning and consideration for the wider community.
- **Professional:** Maintaining the highest standards of conduct and integrity in our decision-making.
- **Accountable:** Taking responsibility for our actions and fulfilling our commitment to ensuring a safe and nurturing environment for all.

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1. Introduction

The purpose of this policy is to detail the procedures for the retention and disposal of information to ensure that the trust carries this out consistently and fully document any actions taken. Unless otherwise specified, the retention and disposal policy refers to both hard and soft copy documents.

By efficiently managing its data and records, the trust will be able to comply with its legal and regulatory obligations and contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the trust and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

Information held for longer than necessary carries additional risk and cost and may breach data protection laws and principles. The Cardinal Newman Catholic Educational Trust retains records only for legitimate legal, operational and educational purposes, ensuring full compliance with evolving data protection legislation, regulatory guidance and best practices, including the latest ICO recommendations.

2. Scope of the Policy

This policy applies to all records created, received or maintained by staff of the trust in the course of carrying out its functions.

This policy applies to all records created, received or maintained by the trust, including those processed by third-party data processors or cloud-based services, ensuring all data remains protected under the trust's governance.

Records are defined as all those documents which facilitate the business carried out by the trust and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

A small percentage of the trust's records will be selected for permanent preservation as part of the institution's archives and for historical research.

3. Responsibilities

The trust has a corporate responsibility to maintain its records and record-keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the CEO.

The person responsible for records management in the trust will give guidance for good records management practice and promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the trust's records management guidelines.

4. Personal Information and Data Protection

The Cardinal Newman Catholic Educational Trust collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the trust. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be legal requirements to collect and use information to ensure that the trust complies with its statutory obligations.

This information can include, but is not limited to, name, address, email address, date of birth, IP address, identification number, private and confidential information, sensitive information and bank details.

The trust also ensures that all third-party providers processing trust data, including cloud storage, HR and payroll services, comply with the UK GDPR, the Data Protection Act 2018 and any relevant cybersecurity standards.

5. Record Retention

Records should be kept for as long as they are needed to meet the operational needs of the trust, together with legal and regulatory requirements. Retention schedules will govern the period that records will be retained and will be found [in the Disposal of Records schedule published on the trust's website].

Records should be assessed to:

- Determine their value as a source of information about the trust, its operations, relationships and environment.
- Assess their importance as evidence of business activities and decisions.
- Establish whether there are any legal or regulatory retention requirements (including the Public Records Act 1958, UK General Data Protection Regulation, Data Protection Act 2018, the Freedom of Information Act 2000 and the Limitation Act 1980).
- Where records are likely to have a historical value or are worthy of permanent preservation, we will transfer them to the County Archives Service if appropriate.

The trust will conduct an annual review of retained records to ensure timely disposal of expired documents and continued compliance with data protection laws. Any records no longer required will be either securely disposed of or anonymised where appropriate.

6. Disposal Schedule

Records should not be kept longer than is necessary for the purposes for which the personal data are processed.

The trust's records manager will ensure that records are regularly reviewed and that once a record or data has reached its retention period date, the owner should refer to the retention schedule for the action to be taken. Not all data or records are expected to be deleted upon expiration; sometimes it is sufficient to anonymise the data in accordance with the combined UK data protection laws (UK GDPR and DPA 2018) requirements or to archive records for a further period.

Retention schedules must be reviewed annually to ensure they remain appropriate. Where data is archived instead of deleted, it must be stored securely with restricted access, and any anonymisation must ensure compliance with the UK GDPR.

7. Destruction and Disposal of Records and Data

All information of a confidential or sensitive nature must be securely destroyed when it is no longer required to ensure compliance with the combined UK data protection laws (UK GDPR and DPA 2018) and the duty of confidentiality that the trust owes its staff, pupils and parents.

The Freedom of Information Act 2000 requires the trust to maintain a list of records which have been destroyed including the date the action was taken and who authorised their destruction.

The secure deletion of electronic records must be conducted in conjunction with the IT provider, ensuring that all data is permanently erased in line with UK GDPR and cybersecurity best practices. This includes secure overwriting, encryption-based destruction and audit verification.

Where data-bearing devices such as hard drives, USBs or cloud accounts are being decommissioned, a full record of the deletion process must be maintained, and certification of destruction should be obtained.

8. Transfer of Records to Archives

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the County Archives Service. The trust should contact the local record office if there is a requirement to permanently archive the records, and the records will continue to be managed via the Data Protection Act 2018 and the Freedom of Information Act 2000.

Where records are transferred to the County Archives Service or any historical repository, the trust will ensure they continue to be managed under data protection legislation, with restricted access where necessary.