



The **Daffodil** Project CIC

Media Retention Policy

Contents

1. Policy Statement
 2. Responsibilities
 3. Consent
 4. Storage and Security
 5. Retention Periods
 6. Disposal
 7. Access and Subject Rights
 8. Monitoring and Review
 9. References
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1. Policy Statement

The Daffodil Project CIC recognises the importance of protecting the privacy and dignity of children with special educational needs and disabilities (SEND). Any images, video recordings, or other media captured during activities are considered personal data and must be handled with the highest level of care. This policy sets out how media will be captured, stored, retained, and disposed of, ensuring compliance with safeguarding obligations and data protection law.

- Safeguards the privacy of children and families.
 - Ensures compliance with the UK GDPR and Data Protection Act 2018.
 - Provides clear rules on how long media is kept and how it is disposed of.
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2. Responsibilities

The Director is responsible for ensuring staff, volunteers, and visitors follow this policy. All staff are individually responsible for handling media appropriately and reporting any concerns or breaches.

- Director: overall accountability.
 - Staff/volunteers: comply with retention procedures.
 - Data Protection Lead: monitor compliance and respond to access/erasure requests.
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3. Consent

Media of children will only be captured with **written parental or guardian consent**. Consent forms must clearly state the purpose (e.g. progress tracking, publicity, training) and retention period. Consent can be withdrawn at any time.

- Written parental/guardian consent required.
 - Purpose and retention period must be explicit.
 - Consent can be withdrawn, triggering deletion of media.
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4. Storage and Security

All media will be stored securely, using password-protected systems and encrypted devices. Printed images are stored in locked cabinets. No media is stored on personal devices.

- Digital media: encrypted, password-protected, access restricted.
 - Physical media: locked storage.
 - No use of personal phones/devices for recording.
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5. Retention Periods

Media will only be kept for as long as necessary for the stated purpose. The following retention periods apply:

- **Progress and learning records** (e.g. Tapestry updates): retained for the duration of the child's placement plus **one year**, then securely deleted.
- **Safeguarding records**: retained in line with statutory safeguarding record-keeping requirements (usually until the child is 25).

- **Marketing/publicity materials:** retained until consent is withdrawn or media is no longer required.
 - **General images and videos not essential to learning or safeguarding:** maximum **two years**, then securely deleted.
 - Progress/learning media: placement + 1 year.
 - Safeguarding media: until statutory deadline.
 - Marketing media: until withdrawn or redundant.
 - Other media: max 2 years.
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6. Disposal

When media reaches the end of its retention period or consent is withdrawn, it will be **securely and permanently deleted**. For physical media, this means shredding or incineration. For digital media, deletion must be irreversible.

- Secure deletion or shredding.
 - No copies left on devices, drives, or personal accounts.
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7. Access and Subject Rights

Parents, carers, and young people (where appropriate) have the right to request access to, correction of, or deletion of their media. Requests will be handled within statutory timescales under UK GDPR.

- Right of access, correction, deletion.
 - Handled within GDPR timescales (usually one month).
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8. Monitoring and Review

This policy will be reviewed annually and updated to reflect legislative or regulatory changes. Breaches of this policy will be treated as a safeguarding concern and may result in disciplinary action.

- Reviewed annually.
 - Breaches = safeguarding incident.
 - May lead to disciplinary action.
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9. References

- Data Protection Act 2018 (incorporating UK GDPR)
- Keeping Children Safe in Education (KCSIE)
- Working Together to Safeguard Children (2018, updated 2023)
- Ofsted requirements for early years/alternative provision

Signed:

Magdalena Van De Voort

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Company number **16166181**

Revision 01

A handwritten signature in black ink, appearing to read 'M. Vindred'.

Director, The Daffodil Project CIC
Date: January 2026