

Data Retention Policy

School Administration Services Limited trading as EasyBus

Version: 1.1

Date: June 2026

Owner: Greig Neilson, Network Manager

Next review: April 2027

1. Purpose

This policy defines how long EasyBus retains personal information collected through the administration of school transport networks, and the process for deleting or anonymising records when retention periods expire.

2. Scope

This policy applies to all personal information held by EasyBus across all administered networks, including student records, parent and guardian records, driver records, vehicle records, and incident records.

3. Retention periods

The following table sets out the retention period for each category of record held by EasyBus.

Record type	Retention period	Basis
Student transport records	One year after the student record is archived. A student is archived when an administrator marks them as inactive — typically at the end of their final year of school transport, or when their family advises they will no longer use the service.	Operational need, Privacy Act 2020
Parent and guardian contact records	One year after the last linked student is archived. Parents linked to multiple students are retained until all linked students have passed their one-year purge eligibility window. Parents	Operational need, financial records obligation

Record type	Retention period	Basis
	linked to active accounts receivable records are retained for the longer of seven years from the last invoice or the one-year-after-archive window.	
Audit log entries — students, parents, guardians	One year after the related student is archived. Purged in the same operation as the underlying record.	Aligned with subject record retention
Audit log entries — all other records (routes, schools, operators, drivers, vehicles, events, schedules)	7 years	NZ business records norm
Student registration submissions (pending or declined)	12 months from submission date	Short-term operational need
Incident and behaviour records	7 years from date of incident	Health and Safety at Work Act 2015
Driver licence and compliance records	7 years from date of record	Health and Safety at Work Act 2015
Vehicle Certificate of Fitness records	7 years	Health and Safety at Work Act 2015
Service request records	3 years	Operational need
Network communication logs (Front CRM)	3 years	Operational need
CCTV footage (where present)	30 days unless subject to an active incident investigation	Standard CCTV retention practice

4. Review and deletion process

EasyBus reviews student records annually at the start of each school year. Records where the retention period has expired are identified and permanently deleted from the EasyBus platform database. Deletion is logged with the date and record count.

Deletion is carried out by the `purge_pii_retention()` database function, which:

- identifies students whose `archived_at` timestamp is more than one year old
- deletes the student record and all associated PII-bearing records (medical conditions, journeys, boarding records, allowances, absence notifications, and so on)
- identifies parents whose linked students have all passed the one-year purge window and who are not tied to active accounts receivable records
- deletes the parent record and all associated records
- removes audit log entries about the purged students and parents in the same operation
- records a row in the append-only purge log noting the date, the IDs purged, and the cutoff date used

Where a record cannot be deleted due to an active legal matter, complaint, or investigation, deletion is deferred until that matter is resolved.

Anonymisation is used in preference to deletion only where aggregate data has ongoing analytical value — for example, historic route usage patterns. Anonymised records contain no name, address, date of birth, or other identifying information.

5. Requests for early deletion

A parent or guardian may request deletion of their student's records at any time by contacting privacy@easybus.nz. EasyBus will action the request within 20 working days unless a legal obligation requires the records to be retained.

6. Responsibility

The Network Manager (Greig Neilson) is responsible for ensuring this policy is followed and that annual deletion reviews are completed. Any questions about this policy should be directed to privacy@easybus.nz.

7. Policy review

This policy is reviewed annually. The next review is due April 2027. Any material changes to data handling practices that occur between scheduled reviews will trigger an immediate policy update.