Matthew Arnold Primary School

Data Retention Policy

Dated: October 2026

Data Retention Policy

1. **Policy Statement**

Matthew Arnold Primary School is committed to retaining personal data only for as long as necessary to fulfil the purposes for which it was collected. This policy ensures compliance with the UK General Data Protection Regulation (UK GDPR), which requires that personal data must not be retained for 'longer than is necessary'. UK GDPR: retention and disposal of records (The Key Leaders)

2. **Purpose**

This policy:

- Sets out clear retention periods for different types of school records
- Ensures compliance with data protection legislation and statutory requirements
- Provides guidance on secure disposal of records
- Protects the school from potential data breaches

3. **Scope**

This policy applies to all staff, governors, and contractors who process personal data on behalf of Matthew Arnold Primary School.

4. **Responsibilities**

Headteacher/Senior Leadership Team:

- Overall responsibility for implementing this policy
- Ensuring staff are trained in data retention and disposal procedures
- Annual review and audit of the retention schedule

Data Protection Officer/Administrator:

- Maintaining the retention schedule
- Coordinating secure disposal of records
- Keeping records of data destruction

All Staff:

- Following the retention schedule for records in their area
- Reporting any concerns about data retention to the DPO

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5. **Data Retention Schedule**

5.1 Pupil Records

Document Type	Retention Period	Action at End of Period	Legal Basis
Primary school pupil	Until the pupil leaves the school	Transfer to secondary/other	The Education (Pupil Information)

Document Type	Retention Period	Action at End of Period	Legal Basis
records	(keep on MIS for 2 terms after leaving)	primary school	(England) Regulations 2005
Curricular records	At least 1 year	Dispose securely	The Education (School Records) Regulations 1989

UK GDPR: retention and disposal of records (The Key Leaders)

5.2 Child Protection Records

Document Type	Retention Period	Action at End of Period	Legal Basis
Child protection files	Until the child's 25th birthday	Dispose securely. Pass to new school if child transfers	Keeping Children Safe in Education 2026
Child protection files (sexual abuse cases)	Until the child's 75th birthday	Dispose securely	IICSA recommendation
Allegations against staff (malicious/false)	Remove from personnel records	N/A	KCSIE 2026
Allegations against staff (other)	Until staff member's normal retirement age OR 10 years from allegation date (whichever is later)	Dispose securely	KCSIE 2026

UK GDPR: retention and disposal of records (The Key Leaders)

Important: Child protection records should be stored either as a separate file, or in a sealed envelope in the pupil file. Child protection records: retention (The Key Leaders)

5.3 Governance Records

Document Type	Retention Period	Action at End of Period	Legal Basis
Admissions records	6 years from admission date	Dispose securely	School Attendance Regulations 2024
Attendance registers	6 years from date of entry	Dispose securely	School Attendance Regulations 2024
Annual governors' reports	10 years	Dispose securely	Education (Governors' Annual Reports) Regulations 2002
Records of educational visits	10 years from visit date	Dispose securely (if incident occurred, retain in pupil record until age 25)	Health and safety guidance
School vehicles	6 years from disposal of vehicle	Dispose securely	Limitation Act 1980

UK GDPR: retention and disposal of records (The Key Leaders)

5.4 Finance Records

Document Type	Retention Period	Action at End of Period	Legal Basis
Contracts	6 years from last payment	Dispose securely	Limitation Act 1980

Document Type	Retention Period	Action at End of Period	Legal Basis
Debtor's records	6 years from end of financial year	Dispose securely	Limitation Act 1980
VAT records (invoices, budgets, bank statements, annual accounts)	6 years from end of financial year	Dispose securely	VAT Notice 700/21

UK GDPR: retention and disposal of records (The Key Leaders)

5.5 Health and Safety Records

Document Type	Retention Period	Action at End of Period	Legal Basis
Accessibility plans	Life of plan plus 6 years	Dispose securely	Limitation Act 1980
Accident records	3 years from accident date (pupil accidents retained in pupil record)	Dispose securely	Social Security Regulations 1979
Monitoring exposure to hazardous substances	5 years	Dispose securely	COSHH Regulations 2002
Health surveillance records	40 years	Dispose securely	COSHH Regulations 2002
Fire risk assessments	Life of assessment plus 6 years	Dispose securely	Fire Safety Order 2005

UK GDPR: retention and disposal of records (The Key Leaders)

5.6 Staff Records

Document Type	Retention Period	Action at End of Period	Legal Basis
DBS certificates (copies)	6 months from recruitment date	Dispose securely	KCSIE 2026
Personnel files	6 years from termination of employment	Dispose securely	Limitation Act 1980
Maternity pay records	3 years after end of tax year	Dispose securely	Statutory Maternity Pay Regulations 1986
Pay records	3 years from end of relevant tax year	Dispose securely	HMRC guidance
Retirement benefits	Minimum 6 years from year accounts signed	Dispose securely	Retirement Benefits Schemes Regulations 1995

UK GDPR: retention and disposal of records (The Key Leaders)

5.7 Property Records

Document Type	Retention Period	Action at End of Period	Legal Basis
Maintenance records	6 years from end of financial year	Dispose securely	VAT Notice 700/21
Title deeds	12 years from end of deed	Dispose securely	Limitation Act 1980

UK GDPR: retention and disposal of records (The Key Leaders)

6. Determining Retention Periods for Other Records

When setting retention periods for records not covered by statutory requirements, consider:

- Why are you holding this data?
- Do you have a legal duty to keep this information for a set period of time?
- Do you need to share this data and, if so, do you need to keep it after sharing it?
- Is it more appropriate for another organisation to keep the information in the long term?
- Will you need the data to meet Ofsted's requirements?
- Can you delete or depersonalise some of the information?
- Do you have a justification to keep the data? UK GDPR: retention and disposal of records (The Key Leaders)

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7. Data Anonymisation

Where possible, if you want to keep older data for analytical purposes, you can anonymise it by removing names and other personal identifiers. For example, you could replace:

- Names with random IDs
- Dates of birth with year of birth
- Postcodes with locality or town names UK GDPR: retention and disposal of records (The Key Leaders)

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8. Secure Disposal Procedures

8.1 General Requirements

The school must:

- Have a procedure for safely disposing records
- Communicate this policy and procedure to all employees to avoid possible data breaches
- Train staff in the secure and timely disposal of records UK GDPR: retention and disposal of records (The Key Leaders)
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8.2 Disposal Methods

Do not dispose of records with regular waste or in a skip. You should:

- Shred paper records using a cross-cutting shredder
- Destroy storage media and hard disks to particles no larger than 6mm
- Dismantle and shred audio and video tapes UK GDPR: retention and disposal of records (The Key Leaders)
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8.3 External Providers

If you use an external provider, make sure the records are shredded on site. The provider should produce a certificate of destruction. Staff working for the external provider should be trained in the handling of confidential documents. UK GDPR: retention and disposal of records (The Key Leaders)

8.4 Record of Destruction

The Freedom of Information Act 2000 requires you to maintain a list of records that have been destroyed and who authorised the destruction. UK GDPR: retention and disposal of records (The Key Leaders)

The school will maintain a **Data Destruction Log** including:

- Date of destruction
- Description of records destroyed
- Retention period that was applied
- Method of destruction
- Name of person authorising destruction
- Name of person carrying out destruction

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9. Court Orders Relating to Pupils

Under UK data protection law, you must not keep more personal information on file than is absolutely necessary. You should only keep a copy of a court order relating to a pupil if having this extra information would be useful.

In most cases, it would be better to record:

- That there's a court order in place for the pupil
- Who informed the school of the court order
- What arrangements the school needs to have in place to support the court order

Whether you keep a copy of the order, or just records relating to it, you must:

- Make sure that this information is kept securely
- Put arrangements in place to prevent unauthorised access
- Abide by the other data protection principles when handling sensitive personal data Child protection records: retention (The Key Leaders)

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10. Review and Monitoring

This policy will be reviewed annually by the Senior Leadership Team and approved by the Governing Body.

The DfE recommends auditing your retention schedule annually. UK GDPR: retention and disposal of records (The Key Leaders)

Next review date: [Insert date]

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11. Related Policies

This policy should be read in conjunction with:

- Data Protection Policy
- Child Protection and Safeguarding Policy
- Information Security Policy
- Freedom of Information Policy

Policy approved by: Governors of Matthew Arnold Primary School