Banks Road Primary School

Data Retention Policy

Provenance/ Author	Person (s) Responsible	Version	Reviewers	Effective Date	Recommended Review Date	Distribution
Deputy Headteacher James Savage	Headteacher Jamie Wilson	V1	Governors	March 2026	March 2027	All Staff

1. Purpose

This policy sets out how Banks Road Primary School manages the retention and secure disposal of records in order to:

- Comply with UK GDPR storage limitation principles — personal data must not be kept longer than necessary.
- Meet statutory retention duties for schools, including those relating to pupil records, safeguarding, staff, governance and finance.
- Support the School's Data Protection Policy by ensuring secure storage, controlled access, and secure destruction.

This policy applies to all records held in any format (paper, digital, electronic systems, cloud storage, CPOMS, MIS, email).

2. Scope

Covers records relating to:

- pupils and parents/carers
- staff and job applicants
- governors
- visitors and contractors
- safeguarding (held in CPOMS or secure paper file where required)
- the School's operations, finance and premises

Applies to all staff, governors, volunteers and contractors with access to School information.

3. Principles

The School will ensure:

1. **Retention is necessary and proportionate** for the purpose for which data was collected.
2. **Statutory retention periods are followed**, based on DfE, UK GDPR and sector guidance.
3. **Records are kept securely** with appropriate access controls and encryption for digital records.
4. **CPOMS is used as the secure safeguarding recording and retention system**, replacing paper records unless required by law.
5. **Data is securely disposed of** when retention ends, and disposal is logged.
6. **Archiving and anonymisation** may be used when long-term retention is required for historical or statistical purposes.

4. Roles and Responsibilities

4.1 Headteacher / Governing Board (Data Controller)

Overall responsibility for data protection and ensuring compliance with this policy.

4.2 Data Protection Officer (DPO)

Provides advice, monitors compliance, supports audits and reviews, and is the main contact for data protection matters.

4.3 Data Protection Assessor / Information Risk Lead

Jamie Wilson, as defined in the Data Protection Policy, oversees risk management, approves retention decisions, and supports IAOs.

4.4 Information Asset Owners (IAOs)

Designated as:

- **School Business Manager – Nicola McGee**
- **Deputy Headteacher – James Savage**

Responsible for ensuring correct retention, security and disposal of records within their areas.

4.5 All Staff

Must follow secure handling and retention procedures and report concerns promptly.

5. Retention Schedule (Core Statutory Set)

Banks Road Primary School adopts the statutory retention periods set out in DfE-aligned guidance and sector practice. The schedule reflects DfE's data protection guidance, updated in March 2026, including the removal of SEND and accessibility plans from the statutory list.

A summary of core retention periods is provided below.

5.1 Pupil Records

Record type	Retention period	Notes
Pupil educational record (primary)	Retain while pupil attends; **transfer to next school** when they leave	Legal duty to transfer.
SEND / EHCP records	**6 years from end of EHC plan**	Retained for 6 years after the end of the EHC plan in line with DfE guidance. Note: The DfE has *removed SEND records from the statutory retention list*, so this period is now based on operational need and Limitation Act 1980 principles.
Child protection / safeguarding records (CPOMS)	**DOB + 25 years**	Held securely within CPOMS; transfer to new school as required.
Child sexual abuse records	**DOB + 75 years**	As per statutory guidance.

5.2 Admissions & Attendance

Record type	Retention period
Admissions register	6 years from date of admission
Attendance register	6 years from date of entry
Absence notes	Current year + 2–6 years (local decision, depending on use)

5.3 Curriculum & Assessment

Record type	Retention period
Curricular record	Minimum 1 year
Pupil work (routine)	Return to pupil, or keep current year + 1 year
Mark books	Current year + 1 year

5.4 Educational Visits

Record type	Retention period
Visit records	10 years from date of visit
Consent forms – no incident	End of academic year (risk-based)
Consent forms – incident	Retain with incident record (e.g., CPOMS/pupil file), usually to **DOB + 25**

5.5 Staff / HR

Record type	Retention period
Personnel file	6 years after employment ends
Payroll / pay records	3 years from end of tax year (minimum)
DBS certificate copies	Destroy as soon as possible; max 6 months if exceptionally required
Allegations (non-malicious)	Until retirement age or 10 years after allegation (whichever is longer)

5.6 Finance

Record type	Retention period
Contracts	6 years from last payment
Invoices / accounts	6 years from end of financial year

Record type	Retention period
VAT records	6 years from end of financial year

5.7 Governance

Record type	Retention period
Annual governors' reports	10 years
Governing Board minutes (principal signed set)	Keep permanently or long-term archive
General correspondence	Current year + 3 years

5.8 Health & Safety / Premises

Record type	Retention period
Accident records	3 years (pupil incidents follow safeguarding retention if relevant)
COSHH monitoring	5 years
Health surveillance	40 years
Fire risk assessments	Life of assessment + 6 years
Accessibility plan	Life of plan + 6 years. This is no longer listed by the DfE as a statutory retention category. Retention is based on operational need and the Limitation Act 1980.

5.9 Digital, Images & CCTV

Record type	Retention period
Emails	Retention based on content; must be filed into correct record system.
Photographs	Retained while pupil on roll + short period; long-term archiving only with clear purpose
CCTV	1 calendar month unless needed for an investigation

6. Legal Holds (Suspension of Deletion)

Records **must not be destroyed** if they relate to:

- ongoing or potential litigation
- safeguarding investigations
- complaints, grievances or disciplinary cases

- FOI or SAR requests
- regulatory, audit or police investigations

Legal holds must be authorised by the Headteacher or DPO.

7. Storage, Security and Archiving

- All storage must comply with the School's **Data Protection Policy security requirements**.
- CPOMS is used as the secure safeguarding storage system with controlled access.
- Sensitive data must only be stored on School systems and encrypted devices.
- Archival decisions must be approved by the DPO/IAO and documented.
- Retention of older data for analytical purposes must follow DfE guidance by *anonymising or depersonalising data wherever possible* (e.g., replacing names with random IDs, and dates of birth with year of birth).

8. Secure Disposal

8.1 Required methods

- **Cross-cut shredding** for paper containing personal/sensitive data.
- **Secure deletion** of digital files, ensuring removal from all storage locations.
- **Destruction of storage media** (e.g., hard drives) where necessary.

8.2 Disposal log

The School maintains a destruction log recording:

- record name/identifier
- description
- number of items
- authorising officer
- disposal date
- name of person who carried out disposal

Maintaining this log is also required under the **Freedom of Information Act 2000**, as noted in current DfE-aligned guidance.

9. Staff Awareness and Training

Staff must know:

- emails are not a record-storage system. Staff must move emails into the correct record system (MIS, CPOMS, HR files, finance system) because *retention periods apply to the content of the email, not the email platform*
- all official records must be stored in the correct system (CPOMS, MIS, HR files, finance systems)
- personal data must not be stored on unauthorised devices
- disposal must follow this policy

10. Monitoring and Review

- Reviewed **annually** by the DPO, Data Protection Assessor and IAOs.
- Audits will check retention, storage, access and disposal compliance.
- Changes in legislation or DfE guidance will trigger earlier review.