



St Mary's and St Peter's CE Primary School

Data Retention

Date:	November 2020	Review Date:	November 2021
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Article 5(e) of the General Data Protection Regulations states that personal data shall be kept for no longer than is necessary for the purposes for which it is being processed. Different categories of data are required for different lengths of time – this policy aims to outline these variances.

Data Disposal Schedule

Pupil Data	1 year after taken off roll
Pupil Created Digital Media *	Up to 1 year after taken off roll.
Pupil Photos/Videos *	Up to 1 year after all featured pupils are taken off roll
Staff Data	7 years after employment ends
Staff Digital Media*	Up to 1 year after employment ending
Staff Email	Upon employment ending
Governor Data	1 year after left post
Governor Applicant Data	1 month after successful appointment
Governor Digital Media*	Up to 1 year after leaving post
Financial Data	7 years
Supplier Data	1 year after last transaction
DBS Check Data	Until parent's children are off-role/no longer present at school
Job Applicant Data	1 month after successful appointment
CCTV Imagery Data	6 months max.
Visitor Data	7 years
Visitor Images & Contact Data	1 year after final visit
Video Conference Recordings	Up to 7 years (depending on nature of meeting and whether conference is minuted)

* Except in cases of legitimate archival interest (e.g. 175th anniversary celebrations or royal visits)

Anonymised, aggregated data may be retained for longer periods than stated for statistical tracking & analysis, in line with Governmental requirements.

Withdrawal of Consent

Where data has been collected under Article 6(a) of the GDPR (for example, some Digital Media), the school will undertake deletion as soon as consent has been withdrawn by the data subject.

Note: The majority of the above categories of data are not collected under Article 6(e).

Disposal Methods

In the case of physical records, upon the end of their retention period, all copies of the data shall be securely shredded.

In the case of digital records, upon the end of their retention period, all copies shall be deleted from the school's computer system and any other related storage mediums (for example: cloud services, e-mail servers and off-site computers).



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Although both methods do provide a small opportunity to 'undelete' the data, in accordance with ICO guidance, the data controller will have no intention to access or use the data further and the information should be considered 'beyond use', and for data protection compliance issues to be 'suspended'.

Policy Effectiveness

This policy will be updated as necessary to reflect best practice and to ensure compliance with any changes made to the GDPR or ICO guidelines.

Headteacher:		Date:	
Chair of Governing Body:		Date:	