ST. JOHN'S CATHOLIC PRIMARY SCHOOL

Data Retention & Disposal Policy

January 2026

Our Mission Statement

The Mission of St. John's Catholic Primary School is to grow and learn in the footsteps of Jesus by being: responsible, caring, prayerful, creative, independent, thoughtful, curious and respectful. We live our Mission by:

- Ensuring that our attitudes and values are transmitted through a curriculum that is consistent with the Catholic faith
- Delivering a curriculum that is relevant, varied, interesting, stimulating, balanced and appropriate
- Developing policies and schemes of work which recognise that R.E. is an integral part of the curriculum
- Developing sound teaching and effective classroom management
- Generating a positive attitude to learning where realistic expectations of pupils and high standards of work are expected
- Using a variety of teaching approaches that reflect the needs of individual pupils
- Participating in projects which focus on the needs of others including local and international charities.
- St. John's is a Catholic voluntary aided primary school, established by the Church to serve the parishes of St. John the Baptist, Trowbridge, St. Bernadette, Westbury and St. Thomas Moore, Bradford on Avon.

1. Introduction and why a records retention policy is needed

St John's Catholic Primary School issues this policy to meet the requirements incumbent upon them under the GDPR and the Data Protection Act 2018 for the handling of personal data in its role as a data controller. The retention of specific documents may be necessary to:

• Fulfil statutory or other regulatory requirements.

• Evidence events/agreements in the case of disputes.

• Meet operational needs.

• Ensure the preservation of documents of historic or other value.

• Evidence child protection matters - recent high profile cases and an ongoing inquiry have emphasised the need to retain information which relates to child protection / allegations against staff for extended periods to assist statutory agencies with their enquires should this be necessary in the future. This also relates to the retention of information where allegations against staff, involving a child, have not been judged to be well founded at the time of the investigation.

The untimely destruction of documents could cause the School:

• Difficulty in defending litigious claims

• Operational problems

• Embarrassment

• Failure to comply with the Freedom of Information or data protection laws.

Conversely, the permanent retention of all documents poses regulatory and security risks and is undesirable.

Appropriate disposal is accordingly implemented at the School for these and the following reasons:

• To comply with the School's retention policy and data protection principles;

• Retention of personal data in the absence of an adequate legal justification may be unlawful;

• To free-up storage space;

• To reduce the risk of fire (in the case of paper records);

• There is evidence that the de-cluttering of office accommodation can be psychologically beneficial for employees.

• To lessen the risk of a data breach through data loss or unauthorised access.

2. Scope

This policy applies to all employees of St John's Catholic Primary School including contract, agency and temporary staff, volunteers, governors and employees of partner organisations working for the school.

3. Retention

In line with the GDPR and the Data Protection Act 2018, the organisation will keep some forms of information for longer than others. Information will not be kept indefinitely, unless there are specific requirements.

Personal data that is no longer needed will be disposed of securely, in accordance with the time periods detailed in the data retention schedule.

This schedule is available from the Information and Records Management Society's (IRMS) Toolkit for Schools (June 2019), and is found here https://irms.org.uk/page/SchoolsToolkit. The schedule cannot be extracted without an IRMS login/membership – you may therefore, need to use Ctrl-F to search for specific records.

4. Disposal

The school will either use an accredited confidential waste disposal provider, or it will shred the information to using a cross-cut shredder. Information on what should be deemed as confidential waste is detailed in Appendix 1.

Electronic files are securely overwritten, in accordance with government guidance, and other media is shredded, incinerated or otherwise disintegrated for data.

A destruction log is kept of all data that is disposed of. The log includes the document type (e.g. Personal data), date of destruction, method and who authorised the destruction.

The School will comply with the requirements for the safe destruction of School and personal data when it is no longer required. The disposal of School data, in either paper or electronic form, is conducted in a way that makes reconstruction highly unlikely.

Under no circumstances should paper documents containing personal data or confidential information be simply binned, or deposited in refuse tips. To do so could result in the unauthorised disclosure of such information to third parties, and render the School liable to enforcement action by the Information Commissioner's Office.

Wherever practicable and appropriately secure, disposal methods should encourage recycling.

Once data has been deleted, it is deemed to be a permanent deletion, irrespective of whether it could technically be reconstructed from a back-up.

5. Monitoring and compliance

Compliance with this policy shall be monitored through a review process. This will be agreed with the Data Protection Officer, and compliance will be reported to the senior management board. Should it be found that this policy has not been complied with, or if an intentional breach of the policy has taken place, the organisation, in consultation with senior management, shall have full authority to take the immediate steps considered necessary, including disciplinary action.

Head teacher : Mrs K O'Rourke

Chair of Governors : Mrs C Doogue

Review cycle:	Annually
Next review due:	January 2027