



Data Retention & Erasure Policy

How long we keep personal records, and how we dispose of them securely

Version 1.0 · 03/07/2026

1. Purpose and principles

The storage-limitation principle requires that personal data is kept no longer than necessary for the purpose it was collected. This policy sets out Swale Tutoring Service's retention periods and secure-disposal arrangements, balancing that principle against safeguarding, contractual, tax and legal obligations.

2. Retention schedule

The following periods apply unless a longer period is required by law or by an ongoing safeguarding or legal matter:

Record type	Retention period
Safeguarding & child-protection records	Until the pupil's 25th birthday, then reviewed
Pupil tuition & progress records	7 years after provision ends
Contracts & agreements (KCC, parents)	7 years after the contract ends
Financial & tax records	6 years plus the current year (HMRC)
Staff/contractor recruitment & DBS records	Duration of engagement + 6 years. DBS certificate copies are not kept beyond 6 months (DBS Code of Practice); the outcome of the check is recorded on the Single Central Record
Records of allegations against staff	Until the person's normal retirement age, or 10 years from the allegation, whichever is longer (KCSiE)
Accident / incident records	Minimum 3 years (longer if involving a child)
Data-breach register	6 years
Marketing / enquiry data	Until consent withdrawn, reviewed annually

Where a record is subject to a live safeguarding concern, complaint, legal claim or regulatory request, it is retained until that matter is fully resolved, regardless of the periods above.

3. Secure disposal

- Paper records are cross-cut shredded or disposed of via confidential waste.
- Electronic records are permanently deleted, and devices securely wiped or destroyed at end of life.
- Disposal of safeguarding records is logged (what was destroyed, when, by whom, and the method).

4. Review and erasure requests

Retention is reviewed at least annually. Individuals may request erasure of their data; such requests are considered under the UK GDPR, subject to overriding safeguarding, legal or regulatory reasons to retain (see Data Protection Policy and the Subject Access Request Policy).

Approved by Shelley Wilson, Director & Designated Safeguarding Lead.
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