

DATA RETENTION & DESTRUCTION POLICY

Effective 1 September 2026 | Review date: September 2027

Organisation	The Community Schools CIC
Company number	14658587
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Policy owner	Claire Meadows-Smith - Principal
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Tutors' Association	Corporate Member CO 306

This policy supports The Community Schools CIC Privacy Policy and explains how long personal information is normally retained and how it is securely deleted or destroyed. The Community Schools CIC operates a deliberately short retention model: routine personal information relating to a student or tutor is normally deleted within one month after that student or tutor leaves The Community Schools CIC.

1. Core retention principle

Our normal operational rule is that routine student and tutor records are not retained for more than one month after the individual leaves The Community Schools CIC. Information should be deleted sooner where it is no longer needed.

This one-month rule does not override a legal, safeguarding, tax, accounting, employment, insurance, regulatory or dispute-related requirement to keep a particular record for longer. Where an exception applies, only the information reasonably necessary for that purpose will be retained, access will be restricted and the record will be deleted when that reason for retention ends.

2. General principles

- Personal data will be kept only for as long as it is genuinely needed for the purpose for which it is held.
- Routine student and tutor operational records will normally be deleted within one month after the individual leaves.
- Records subject to a safeguarding concern, complaint, legal claim, investigation, insurance matter or other legal hold must not be destroyed while the matter remains live.
- Where only part of a record needs to be retained, unnecessary personal information should be removed or minimised.
- Where appropriate, information may be anonymised rather than retained in identifiable form.
- Deletion from active systems should be completed promptly. Backup copies may remain temporarily until they expire through normal secure backup cycles where immediate selective deletion is not technically practicable.

3. Retention schedule

Record category	Normal Community Schools retention	Exceptions / notes
Online tutoring recordings	While the student is current; normally deleted within 30 days of leaving.	May be retained longer only where necessary for safeguarding, a complaint, legal/regulatory obligations or a dispute. Access remains restricted.
Routine student registration/contact details	Delete within 1 month of the student leaving.	Keep only information that must be retained under another category below.

The Community Schools CIC is a **not-for-profit cooperative** of qualified teachers dedicated to providing safe and affordable access to the highest quality tutoring according to needs that are not properly satisfied by the education system.

Routine attendance, progress notes and tutor reports	Delete within 1 month of the student leaving.	Safeguarding information must not be kept within routine tutor notes and follows the safeguarding exception below.
Routine tutor operational records	Delete within 1 month of the tutor leaving.	Employment, payroll, safeguarding, tax and legal records may need to be retained separately for longer.
Parent/client contract and key contractual correspondence	Routine copies may be deleted within 1 month where no longer needed operationally.	The organisation must retain any contractual or financial evidence required by law, tax rules, insurers or for an active/potential legal claim.
Invoices, accounts and tax records	Retained for the period required by law rather than the one-month operational rule.	Company and tax records will normally need to be kept for longer than one month.
Complaints and complaint-investigation records	Delete within 1 month after closure where no continuing purpose exists.	Retain longer where necessary for safeguarding, an unresolved dispute, insurance, regulatory action or legal claims.
Safeguarding and child-protection records	Not subject to automatic one-month deletion.	The DSL will determine appropriate retention, taking account of the nature of the concern, partner-school/statutory involvement, safeguarding guidance and legal requirements.
Unsuccessful tutor/job applications	Normally delete within 1 month after the recruitment decision.	Retain longer only where a specific lawful reason applies, such as an active dispute or agreed talent-pool arrangement.
Successful tutor personnel/employment records	Routine operational copies deleted within 1 month of leaving.	Annual-leave and holiday-pay records must be retained for at least 6 years. Payroll, pension, tax, disciplinary, safeguarding and other employment-law records may also require longer retention.
DBS certificate copies / certificate information	Do not keep longer than necessary and destroy securely once no longer required.	Where DBS certificate information must be retained temporarily after a recruitment decision, it will be held securely and only for the period permitted/required by DBS guidance. Limited check details may be recorded where lawful.
Marketing contact information	Delete within 1 month after the relationship ends unless the person remains opted in.	A minimal suppression record may be retained where necessary to ensure an opt-out is respected.
Website and security logs	Kept only for the short period necessary for security, troubleshooting and system administration.	The exact period will reflect the configuration and security needs of the system and will be reviewed.

4. Safeguarding records

Safeguarding records are an important exception to the one-month rule. They must not be deleted simply because a student or tutor leaves. The Designated Safeguarding Lead (DSL) will decide, or obtain advice on, the appropriate retention period according to the circumstances of the concern, involvement of a school or statutory agency, legal requirements and the need to protect children or respond to future concerns.

5. Financial, tax and employment records

Certain company, tax, payroll and employment records have statutory or legal retention requirements that are longer than the normal one-month rule. In particular, from 6 April 2026 employers must keep adequate records showing compliance with statutory annual-leave entitlement and holiday-pay requirements for at least 6 years. This includes the records needed to demonstrate the calculation and payment of rolled-up holiday pay for qualifying irregular-hours or part-year tutors. These records are therefore an express exception to The Community Schools CIC's normal one-month deletion rule. Other payroll, tax and employment records will also be retained for any longer period required by law. Records retained under this exception should be limited to what is necessary and kept separately from routine student or tutor operational records wherever practicable.

6. Secure deletion and destruction

- Paper records containing confidential or personal information must be cross-cut shredded or placed in an approved confidential-waste process.
- Electronic records must be deleted using the controls available on the authorised Community Schools system.
- Student or tutor records must not remain in personal email accounts, personal cloud storage or personal devices after they are no longer needed.
- Devices being disposed of or reused must have personal data securely erased or the storage media appropriately destroyed.
- Where data is held by a service provider, deletion should be managed through the relevant account or supplier process.

7. Leaving process for students and tutors

When a student or tutor leaves The Community Schools CIC, the administration team should trigger a one-month deletion review. Routine records should be identified and deleted by the end of that period. Any record being retained beyond one month must have a clear reason and should be placed in the appropriate restricted category, such as safeguarding, financial, employment or legal records.

8. Access removal for departing tutors and staff

Access to Community Schools systems should be removed promptly when a tutor or staff member leaves. Community Schools information must not be retained in personal accounts or devices. Any authorised local copies must be transferred to an authorised system or securely deleted.

9. Monthly and annual housekeeping

The administration team should operate routine deletion processes so that records do not remain beyond the one-month period unintentionally. At least annually, the organisation should review retained exception records and delete or anonymise any information for which the original reason for retention no longer applies.

10. Individual data-protection rights

Requests for erasure or other data-protection rights will be handled under the Privacy Policy. A request for deletion does not require The Community Schools CIC to delete information that it is lawfully required or entitled to retain, for example for safeguarding, statutory record keeping or the establishment, exercise or defence of legal claims.

11. Review



This policy will be reviewed at least annually and sooner where there is a significant change in law, safeguarding guidance, our online administration system or our working practices.

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