



# **Data Retention Policy**

August 2024

*To be reviewed: August 2025*

## Introduction

As part of the day-to-day running of our service, we collect and process personal data from a variety of sources. This personal information is collated in several different formats including session records, student information reports, letters, emails, legal documents, employment records, operations records, images and statements. The personal data is stored both as a hard copy and in electronic form.

## Aims of the policy

Our service will ensure that the personal data that we hold is kept secure and that it is held for no longer than is necessary for the purposes for which it is being processed. In addition, we will retain the minimum amount of information to fulfil our statutory obligations and the provision of goods or/and services – as required by data protection legislation, including the General Data Protection Regulation (GDPR).

## Retention

This retention policy (along with its schedule), is a tool used to assist us in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed and our service practices.

Decisions around retention and disposal are to be taken in accordance with this policy. As and when the retention period for a specific document has expired, a review is always to be carried out prior to the disposal of the document. This does not have to be time-consuming or complex. If a decision is reached to dispose of a document, careful consideration is to be given to the method of disposal.

## Responsibility

Michael Leishman is responsible for keeping this retention schedule up to date in order to reflect changing service needs, new legislation, changing perceptions of risk management and new priorities for our service.

Michael Leishman is responsible for determining (in accordance with this Policy) whether to retain or dispose of specific documents.

## Disposal

Our service must ensure that personal data is securely disposed of when it is no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.

The methods of disposal are to be appropriate to the nature and sensitivity of the documents concerned and include:

- Non-Confidential records: place in waste paper bin for disposal
- Confidential records: shred documents
- Deletion of Computer Records
- Transmission of records to an external body
- Cloud storage

The table below contains the retention period that we have assigned to each type of record. This will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods.

Exceptional circumstances should be reported to Michael Leishman without delay.

### Appendix 1: Document retention schedule

#### Student records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Student Profiles	30 days after support complete	Cloud storage	Set support	Delete from system
Session and Review Records	30 days after support complete	Cloud storage	Share support information	Delete from system

#### Parent/carer details:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Contact information	30 days after support complete	Cloud storage	Communication and safeguarding	Delete from system

#### Communication records:

Type of record	Retention period	Where is it stored?	Reason	Method of deletion
Email correspondence	Archive emails after 6 months	Email cloud storage	Reference	Archived
Text Messages	Archive emails after 6 months	Text message service cloud storage	Reference	Deleted