

# Record Management, Retention and Disposal Policy

## Seven Springs Education



<b>Approved by:</b>	Willow Hewitt	<b>Date:</b> 05/09/23
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## 1. Policy Statement

The purpose of this policy is to detail Seven Springs Education's management of 'records' and procedures for the retention and disposal of information. This policy aims to ensure that we comply fully with the requirements of GDPR. Unless otherwise specified, this policy refers to both hard and soft copy documents.

This policy should be read and actioned in accordance with other Seven Springs Education policies and notices dealing with information governance:

- Data Protection Policy
- Privacy Notices
- Online Safety Policy
- Code of Conduct
- Child Protection and Safeguarding
- Online Privacy Notice
- Cookies Statement

## 2. Data Storage

Data will be stored in accordance with GDPR regulations and data protection policies (see our Data Protection Policy).

## 3. Data Disposal

At the end of the retention period stated, we will erase your data, including copies and from backups, or anonymise it if there is clear justification for keeping it.

We will only ever keep personal data indefinitely if we are holding it only for:

- Archiving purposes in the public interest
- Scientific or historical research purposes
- Statistical purposes

## 4. Data Sharing

Where Seven Springs Education must share personal data with other organisations, an agreement will be made to ensure the retention policy is followed and only kept and used for its intended purpose.

## 5. Records Retention Schedule

Data Class	Description and extra information	Statutory Provisions	Retention Period	Action on Retention Expiry
<b>Students and Parents</b>				
Student Record	Includes personal details, contact details, information on parents, assessment information, reports, educational records, behavioural information, SEND information	Keeping Children Safe in Education 2023 Working Together to Safeguard Children 2018 Data protection regulation	6 years from student leaving date	Secure disposal by shredding/file deletion
Child Protection information	We keep this separate from student records and retain this for safeguarding reasons	Section 175, Education Act 2002 Keeping Children Safe in Education 2023 Working Together to Safeguard Children 2018	Date of birth + 25 years	Secure disposal by shredding/file deletion
Records relating to registration and agreements	e.g. registration forms for courses, scholarships or other activities		6 years from student leaving date	Secure disposal by shredding/file deletion
Attendance record	e.g. absences and late attendance		3 years from date of creation	Secure disposal by shredding/file deletion
Classwork and homework records	e.g. comments given by tutors after class, work		1 year from date of creation or longer	Secure disposal by shredding/file deletion

	students submitted for marking, comments		based on student's/parent's consent	
Photos, recordings and Zoom logs (including chat)	<p>We use photos, recordings and Zoom logs for safeguarding and monitoring purposes. These are stored securely and only accessed when a safeguarding concern arises.</p> <p>Where we use these for marketing purposes, we will have explicitly asked for consent and stated the purpose.</p>	<p>Keeping Children Safe in Education 2023</p> <p>Working Together to Safeguard Children 2018</p> <p>Data Protection Act/GDPR (2018)</p>	<p>6 months or until the end of NTP / requirements as set by partnering schools</p> <p>10 years from date of consent for marketing purposes or for the time and purpose specified when consent is given</p>	Secure disposal by shredding/file deletion
Parents/Guardian/Family details	We use this information for safeguarding, emergency contact, providing financial support and bursaries, and for invoicing	<p>Keeping Children Safe in Education 2023</p> <p>Working Together to Safeguard Children 2018</p>	6 years from student leaving date unless otherwise required by safeguarding partners	Secure disposal by shredding/file deletion
<b>Employee/Administration</b>				
Personal File		Limitation Act 1980 (Section 2)	6 years from the end	Secure disposal by

		Safer Recruitment	of employment unless there is an ongoing Independent Inquiry into Child Sexual Abuse (IICSA)	shredding/file deletion
Payroll information	Including information for Income Tax and National Insurance. We use this to pay staff and for tax purposes.	Taxes Management Act 1970 / IT (PAYE) Regulations	6 years after the end of the tax year	Secure disposal by shredding/file deletion
Sick Pay		Statutory Sick Pay (General) Regulations	Current year + 6 years	Secure disposal by shredding/file deletion
Maternity Pay		Statutory Maternity Pay Regulations	Current year + 3 years	Secure disposal by shredding/file deletion
Foreign national ID documents and/or Proof of Right to Work		Immigration (Restrictions on Employment) Order 2007  An employer's guide to right to work checks (Home Office May 2015)	2 years from the end of employment	Secure disposal by shredding/file deletion
HR files and training records		Limitation Act 1970 and Data Protection regulation	3 years from the end of employment	Secure disposal by shredding/file deletion
Annual appraisal/assessment records		Commercial	6 years from creation	Secure disposal by shredding/file deletion
Disciplinary records		Commercial  Keeping Children Safe in	6 years from creation	Secure disposal by shredding/file deletion

		Education 2023 Working Together to Safeguard Children 2018		
Working hours records and timesheets		Working Time Regulations 1998	2 years	Secure disposal by shredding/file deletion
Job application information	Including CVs and other related information used during the application process	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976	6 months from the notification of outcome	Secure disposal by shredding/file deletion
Pre-employment vetting	Information used here will be noted in the staff's personal file.	ICO Employment Practice Code	6 months	Secure disposal by shredding/file deletion
Disclosure and Barring Service (DBS) checks and annual criminal record checks	Includes certificates and the Annual Declaration of Criminal Record and other relevant information	Single Central Record Requirements under Part 4 of the Schedule to the Education (Independent School Standards) Regulations 2014	6 months For NTP tutoring, certificates will be kept for longer than 6 months, as required.	Secure disposal by shredding/file deletion
Allegations record		Keeping Children Safe in Education 2023 Working Together to Safeguard Children 2018	Until the person's retirement age or 10 years from the date of the allegation, whichever is the longer, then reviewed. Records will be retained if there is an ongoing Independent Inquiry into Child	Secure disposal by shredding/file deletion

			Sexual Abuse (IICSA).	
<b>Company Records</b>				
Company Articles of Association, Rules/by laws		Companies Act 2006 Charities Act 2011	Permanent	
Member/director minutes of meetings and written resolutions		Companies Act 2006 Charities Act 2011	Permanent. Retain one signed master copy, together with one copy of any related agenda	
Confidential minutes of Member/director meetings		Data Protection Regulation Companies Act 2006 Charities Act 2011	Permanent, but consider possible data protection issues, redact if necessary, and retain one signed master copy and any related agenda	
Contracts e.g. with suppliers		Limitation Act 1980	6 years from the end of the contract term	Secure disposal by shredding/file deletion
Contracts executed as deeds		Limitation Act 1980	12 years from the end of the contract term	Secure disposal by shredding/file deletion
Intellectual property (IP) records and legal files		Limitation Act 1980	Life of service provision or term in IP plus 6 years	Secure disposal by shredding/file deletion
<b>Tax and Finance</b>				



Annual accounts and review		Companies Act 2006 Charities Act 2011	6 years from the end of the relevant tax year	Secure disposal by shredding/file deletion
Tax and accounting records		Finance Act 1998 Taxes Management Act 1970	6 years from the end of the relevant tax year	Secure disposal by shredding/file deletion
Information relevant for VAT purposes		Finance Act 1998 and HMRC Notice 700/21	6 years from the end of the relevant tax year	Secure disposal by shredding/file deletion
Banking records/receipts book/sales ledger		Companies Act 2006 Charities Act 2011	6 years from the end of the relevant tax year	Secure disposal by shredding/file deletion
<b>Insurance</b>				
Employer's Liability Insurance		Employers' Liability (Compulsory Insurance Regulation) 1998	40 years	Secure disposal by shredding/file deletion
Policies		Commercial	3 years after lapse	Secure disposal by shredding/file deletion
Claims correspondence		Commercial	3 years after settlement	Secure disposal by shredding/file deletion
<b>Health and Safety</b>				
Accident records	We use this data to prevent further accidents.	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995	6 years from date of incident	Secure disposal by shredding/file deletion

Medical scheme documentation		Commercial	3 years from date of leaving	Secure disposal by shredding/file deletion
<b>Marketing and Communications</b>				
Newsletter subscribers' data	We use this to provide a newsletter.		Up to when 'opt out'	Automatic deletion
Correspondence and communication	Including general enquiries		3 years from last communication	Secure disposal by shredding/deletion

## 6. Contact Us

If you have any questions or concerns about this policy, please contact our Data Protection Lead, Joyce Wong ([joyce@seven-springs.co.uk](mailto:joyce@seven-springs.co.uk)).