



LONDON PROFESSIONAL ACADEMY (LPA)

**DATA RETENTION AND
DISPOSAL POLICY**

Title: Data Retention and Disposal Policy

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AIM

London Professional Academy (LPA) seeks to balance the benefits of keeping detailed and complete records, for the purposes of good practice, archives or general reference, with practical considerations of storage, space and accessibility. There are legal considerations in respect of retention of records and documents which must be borne in mind by all staff. All aspects of Data Protection are covered by LPA Data Protection Policy.

POLICY

London Professional Academy (LPA) must, in respect of its processing of personal data, comply with the Data Protection Act 2018, the General Data Protection Regulation 2016/679, and related legislation.

This Retention Policy should be read in conjunction with LPA's Data Protection Policy, which sets out the academy's overall approach to data protection matters and sets out the rationale for why a Retention Policy is required for personal data.

LPA is under a legal obligation only to keep personal data for as long as the academy needs it. Once LPA no longer needs personal data, the academy must securely delete it.

LPA recognises that the correct and lawful treatment of data will maintain confidence in the academy and will provide for a successful working environment.

This Policy applies to all LPA employees, consultants, contractors and temporary personnel hired to work on behalf of the academy.

All persons with access to personal data must comply with this Retention Policy.

Please read this Retention Policy carefully. All LPA staff must comply with it at all times. If you have any queries regarding this Retention Policy, please consult with LPA. You are advised that any breach of this Retention Policy will be treated seriously and may result in disciplinary action being taken against you.

LPA staff will receive a copy of this Policy when they start and may receive periodic revisions of this Policy. This Policy does not form part of any academy staff contract of employment and the academy reserves the right to change this Policy at any time. All staff are obliged to comply with this Policy at all times.

ABOUT THIS POLICY

This Retention Policy explains how LPA complies with our legal obligation not to keep personal data for longer than we need it and sets out when different types of personal data will be deleted.

LPA will retain a document based on the following principles:

- The document or record still has a use or business purpose
- There is an applicable Statutory Minimum Retention Period
- The document or record is relevant to an outstanding funding claim or current litigation, arbitration or investigation. Or, the record had evidential value for a possible claim
- The document is subject to audit.

DATA RETENSION PERIODS

- LPA has assessed the types of personal data that the academy holds and the purposes academy use it for.
- The table below sets out the retention periods that LPA has set for the different departments within the academy, and the different types of data that they each hold.
- If any member of LPA considers that a particular piece of personal data needs to be kept for more or less time than the period set out in this policy, please contact LPA.

ARCHIVE STORAGE AND RETRIEVAL

- Documents where possible will be stored in a way that environmentally sustainable, preserves their integrity and readability and restricts access to appropriate individuals only.

- Upon a request from an external agency LPA may make available for access to the requested records.
- Any transfer of ownership of the data or of the documents shall be documented.
- The new owner shall assume responsibility for archiving.
- Access to archives shall be restricted to the named individuals responsible for the archives.
- The media used to store essential documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available upon request.
- Any alteration of records should be traceable.
- All essential documents should be boxed and labelled with the contract reference number, any course reference, the date they were archived, and date to be destroyed (if available).
- The department administrator (or equivalent) should maintain a record of details of archived essential documents.
- Records should include details of the contract reference, archiving location and person authorised to access these documents, the date they were archived, and date to be destroyed (if available).
- The documents should be archived in an appropriate room or locked cupboard (consider fire protection without water sprinkler systems, water protection, for humid conditions, pests etc.).
- The room or cupboard must be secure with access only by authorised personnel.
- If appropriate, an external archive site may be utilised as arranged by LPA.

RETENSION PERIODS FOR DIFFERENT DATA

Type of Data	Format	Deletion date (if manual)	Deletion date (if electronic)	Deletion procedure (if manual)	Deletion Procedure (if electronic)	Comments

Exam results	Electronic	6 years	10 years			Results logged and recorded on student record.
Student Consent Forms	Paper copies	After course has finished				
Coursework / portfolios	Paper copies	3 years after completion	N/A			12 weeks after certification
Complaints & Compliments	Electronic		3 years			
Enrolment and Learner Record	Paper & electronic	6 years	10 years			Storage of paper copies. Any added to portfolios, deleted by same process.
Safeguarding Files	Electronic		7 years		Deleted electronically	

Student Attendance / registers		6 years	10 years			Paper/Electronic kept for the same duration
Student Financial support documents		5 years	5 years			Bursaries and support
Curriculum course forms		N/A	3 years			Available online
Statistical reports		N/A	3 years			Available online for longer period
Admissions records		1 year	10 years			

Additional Learning Support records	Paper and Electronic	6 years	6 years			Learning support records
Assessment & IV records	Paper and Electronic	3 years	3 years			
Financial Records	Paper and Electronic	6 years	indefinitely			This covers all invoices

Staff Records	Paper & Electronic	7 years	7 years		Shredded	Paper in archive store
Visitor Information	Paper	5 Days				
Governance: Signed Minutes for meetings	Paper	6 years				
Governance: Process Papers	Paper	6 Years				
Governance: Register of Interest Forms	Paper or Electronic	6 Years				

Governance: SMT contact information	Paper or Electronic	2 years				
Governance: Images in printed media	Paper or Electronic	12 months after appointment ended				
Capital Projects	Paper or Electronic	12 years				

CHANGES TO THIS POLICY

LPA reserves the right to change this policy at any time.