

# Retention of Records



November 2019  
Review Date: November 2020

## Retention of Records

### *Scope*

All Water Lilies Swimming School Ltd records, whether analogue or digital, are subject to the retention requirements of this procedure.

### *Responsibilities*

The company owners are responsible for the retention of all assets and data.

### *Data Held*

Further information on what specific data is held is available in document 12—Privacy Notice.

The data retention rates below are based upon no requests being received to remove the data earlier as per forms 14 or 15—Data Subject Withdrawal notice. The data retention periods for those who request withdrawal are detailed overleaf.

#### *Swim School Lessons*

- For 3 financial years after the last enrolment from a swimmer within an account.
  - For example should a child stop swimming with us in December 2017 this is in the 2017 to 2018 financial year and so 3 years after this would be April 2021.

#### *Course Enrolment*

- For 3 financial years after the course is completed unless an Awarding Body requires different retention rates. Where this is the case you will be informed upon booking.
  - For example should your course be in June 2017 this is in the 2017 to 2018 financial year and so 3 years after this would be April 2021.

#### *Employees—pay information*

- Bank information is removed within 90 days of a P45 being generated
- Contracts, pay slips, qualifications and all other personal information is removed 7 financial years after employment ends.
  - For example should your employment be terminated in April 2018 this is the 2018—2019 financial year and so 7 years after this would be April 2026.
- HR matters (e.g. disciplinary records) will be destroyed within 90 days of them expiring as detailed on the initial letter.

#### *Financial Records*

- All financial information (invoices, quotations, payment records etc.) are kept for 10 years after the end of the financial year with which they relate to.

For those who request earlier withdrawal the following applies:

#### *Swim School Lessons*

- Our online system is currently being updated to allow the complete removal of data. At present it is only removed to non-admins and our system developers. The anticipated plan for the removal of this is that should somebody request removal the standard procedure will be followed and this will be entered on to the system. 30 days later the data will be purged from the system completely. This 30 day window is to give Water Lilies Swimming School Ltd time to respond to the request and explain the implications of removal and allow for the

Data Subject to change their mind. It also provides a fail safe in case the wrong persons data is marked for deletion.

#### *Course Enrolment*

- We will look to remove all information within 30 days of the request being received. However, where information is stored on third party systems (e.g. our Awarding Bodies) information will be supplied to the Data Subject on how to follow this up and request removal from those systems.

#### *Employees—pay information*

- Data can only be removed once an employee is no longer employed by the company and after all legal obligations have been fulfilled (for example after the end of the tax year).
- Where this is the case we will aim to remove all records permissible by law within 30 days. Any other pieces of information which need to be retained (e.g. financial records) will be detailed in our response to the Data Subject.

#### *Financial Records*

- All records can only be removed after it is no longer a requirement to keep the information for tax reasons (e.g. 6 years after the end of the financial year in which the payments relate).
- Where a request comes before this time period is reached all other pieces of information will be removed and the Data Subject informed in our response.

#### *Procedure*

For all storage media (electronic and hard copy records) Water Lilies Swimming School retains means to access that data.

The Data Protection Officer (DPO) is responsible for destroying data once it has reached the end of the retention period as detailed on the previous page.

All data is checked for its destruction deadline at the end of each financial year.

Destruction must then be within 90 days of this date. This means that using the examples on the previous page when the retention period is reached each April it will be destroyed within 90 days of this date.

Destruction is handled by the information being securely deleted and, if remotely stored, removed from backup mediums.

### *Monitoring and Review*

We will monitor all of the feedback that we receive in relation to the issues affected by the Policy and will amend the policy as necessary.

The Policy will be updated with any amendments to existing legislation or new legislation.

In any event, all policies are reviewed annually although updates to versions etc. will only take place every three years should there be no other changes to the policy.

### *Document Owner and Approval*

The Data Protection Officer (DPO) is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff in the office and online.

This policy was approved by the Company Director on 25<sup>th</sup> November 2019 and is issued on a version controlled basis under the signature of Company Director.

Date	Version	Author/Contributor	Amendment Details
25 <sup>th</sup> November 2019	1.00	Teresa Griffin	None