



# DATA RETENTION POLICY

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## Links to UNCRC

This policy links to the following UNCRC articles:

- Article 16 – Protection of Privacy

## DOLLAR ACADEMY RETENTION POLICY

Dollar Academy a registered charity registered in Scotland with SC009888 and whose registered office is at 23 West Burnside, Dollar, FK14 7DZ (the "School") is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.

### Purpose of this document

The purpose of the Retention Policy is to explain what personal information we may collect about you as a member of the Dollar Community.

The types of personal information that we collect, its purpose, and retention period is detailed in the tables below. This policy document will apply alongside our additional privacy policies. These other policies would have been brought to your attention separately, however, if you are unsure then please do not hesitate to get in touch with us.

### Security of data

Data is held securely in both physical and electronic formats. Physical data is stored in locked filing cabinets and offices. The cabinets and offices where these are located are always locked outside of normal working hours.

Electronic security is maintained by the Director of IT. 'Pen' testing (penetration testing of the network) is carried out and regular reviews are held. The Director of IT is a member of the Health, Safety and Security Working Group which reports to the school governors.

### Queries and complaints

If you would like to raise a query or make a complaint in regard to your data, please contact:

Mrs Victoria Mason (Deputy Rector)  
Dollar Academy  
Dollar  
FK14 7DU  
01259 742511  
[dataprotection@dollaracademy.org.uk](mailto:dataprotection@dollaracademy.org.uk)

You have the right to complain to the ICO if you feel that we have breached any aspect of GDPR. If you feel that we have not resolved your complaint sufficiently you may contact the ICO via their concerns page at this address:

<https://ico.org.uk/concerns/>

Data type	Examples of data collected	Retention period
Academic and Guidance	Personal data is kept such as name, address, date of birth, contact details, medical and previous educational records. Data related to academic progress, school reports, UCAS, disciplinary records and any other relevant information relating to a pupil's educational experience is processed.	Pupil records are maintained for the duration of their school career. When former pupils become <b>21 years of age</b> their records are reviewed. Essential elements such as reports, achievements, and issues relating to child protection are digitized and kept in the <b>historical archive</b> .
Admissions	Personal data such as name, address, date of birth, contact details and previous educational records. Application details such as financial and medical records, and all correspondence.	Applicants for admission to Dollar Academy have data collected at the point of enquiry. If they do not receive or accept a place at the school their records are destroyed after <b>1 year</b> . If they do receive a place their admissions data is included in their pupil academic records.
Alumni	Contact details, biographical information, employment details, familial links (e.g. siblings who attended Dollar), attendance at events, and donation history.	Explicit consent is requested to hold this data. The data is kept as part of the school's historical archive and for the purposes of fundraising and marketing under legitimate interest. The data is minimized when the FP is <b>deceased</b> and only information relevant to the <b>historical archive</b> of the school is kept.
Bursary	The Bursary keep all current and former staff records (such as PVG certificates), including governors of the school. Financial records of current parents are kept, as well as all financial records related to the running of the school such as contracts for maintenance and accounts. Records of the public are kept where general contact has been made. CCTV footage is kept for security purposes.	Staff and governor data is minimized <b>1 year</b> after departure, retaining data for the historical archive and for compliance with child protection legislation. All financial records are kept for between <b>7 and 20 years</b> in line with regulations. Public records are kept for <b>25 months</b> after contact. CCTV records are kept for <b>14 days</b> .

E-mails	All information that is processed in email format is stored through Microsoft Outlook.	Staff are encouraged to minimize email data (i.e. delete emails) on an ongoing basis. All emails are deleted automatically after <b>25 months</b> . Any emails that are considered to be highly important will be transferred to the pupil's school record.
Support for Learning	All data relating to support for learning is processed, including educational psychologists' reports, in-house assessments, pupil support files, IAA files and panel meetings.	Data is minimized at the end of the academic session when the pupil has left Dollar. At age 21 the remaining records are added to the overall pupil record, digitized and kept for the <b>historical archive</b> .
Health, Wellbeing Safety and Security	Data is kept to maintain statutory compliance and to ensure the safe running of the school, such as fire safety records, training records and minutes of the Health, Safety and Security Committee.	All data is kept in compliance with statutory guidelines, and anonymized whenever possible.
Retention of Staff Records	All data relating to staff will be kept throughout the duration of their employment by the school.	Disciplinary and Grievance meeting minutes, witness statements, findings, and notices of outcomes will be kept until the third anniversary of employees' termination of employment. Where the school and an employee enter into a Settlement Agreement under which the employee's employment terminates, formal records of the process and the Agreement entered into will be retained for three years following termination of employment.

## PRIVACY POLICY GDPR

### About

Dollar Academy, a registered charity registered in Scotland with SC009888 and whose registered office is at 23 West Burnside, Dollar, FK14 7DZ (the "School"), is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.

We process data on the following categories of people:

- Children, and their parents, who apply for a place at Dollar Academy
- Current pupils
- Parents of current pupils
- Former pupils
- Members of staff
- Former members of staff
- The governors of the school

For prospective pupils and parents, please refer to our Admissions Privacy Policy. For Former Pupils, please refer to our Alumni Privacy Policy.

### Why the Data is Collected

The purposes of collecting and processing data are to:

- provide our pupils with an education
- ensure the health, safety and security of everyone in the Dollar Academy community
- to maintain an historical record of the school
- to ensure compliance with key legislation, particularly in regard to child protection

### How the Data is Used

We obtain pupil information via data collection forms at the start of each academic year. In addition, when a child joins us from another school we receive a secure file containing relevant information. Pupil data is essential for the school's operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis (through actively given with informed consent). In order to comply with GDPR we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

### The Lawful Basis for Processing the Data

Under Article 6 of GDPR ('Lawfulness of processing') there are six ways in which data can be lawfully processed.

- When consent has been given for one or more specific reasons
- Consent is given to hold personal data through the data collection forms at the start of the academic year
- Complying with legal obligations, such as the provisions of the Children and Young People (Scotland) Act 2014
- To protect the vital interests of a data subject
- Medical information is gathered to ensure that pupils are safe and healthy
- For tasks carried out in the public interest CCTV is used to protect our community and our historically listed buildings
- For legitimate interests of Dollar Academy, such as holding records of achievement for our historical archive

Article 9

Article 9 of GDPR ('Processing of special categories of personal data') states that "processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited." At Dollar we use biometric data (fingerprinting) for payment in the canteen. We only collect information about ethnic origin to ensure that we are an equal opportunities employer. If we find it necessary to process any other special category of data we will ask for explicit consent to do so. Please note: the majority of our processing will not be done on the basis of consent. Consent is not relied upon for any processing essential for educating our pupils. Where we process rare data on the basis of consent (for example – use of pupil photos on websites, social media) we will explicitly ask for this, and chiefly through our contract with parents.

### **How the data is stored and how long for, and how security is ensured**

We conduct a full data audit and review this each term. For details about categories of data, retention and security please read our retention policy.

### **Who/which organizations data is shared with and why**

We share data with external bodies to assist with wider educational purposes. For example, we provide anonymised data for census information. The bodies we work with annually are:

- Clackmannanshire Council
- Education Scotland
- The Scottish Council of Independent Schools
- The Independent Schools Council
- The Headmasters' and Headmistresses' Conference
- The Electoral register
- The National Health Service

We use on-line third party organisations to support the business of the school. These services are contracted and approved for use by the school. We take great care to ensure that all third parties hold data within the EEA.

### **International data transfers**

Our website uses different types of cookies so that we can better understand the use of our website and inform our services. The data that we collect from you will be stored inside the UK, however some of the cookies on our website are placed by third party providers. Third party providers such as Google Analytics, You Tube, Vimeo and Meta will collect and process your data if you provide your consent for them to do so, and this data may be transferred and stored outside the UK. Please read our cookies policy ([Cookies Policy – Dollar Academy](#)) for further information on what data is collected and processed by Google Analytics. Further information on how Google Analytics will use your personal data can be found on the following ([Privacy Policy – Privacy & Terms – Google](#))

### **What those organisations will do with the data**

These organisations store the data we provide them with and do not share them with other bodies. The data will never be used for automated decision making.

### **Individuals' rights over data (including right of access)**

You have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress

- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- seek redress, either through the ICO, or through the courts

### **Accessing your data**

If you would like to make a Subject Access Request, or raise a query in regard to your data, please contact:

Mrs Vicky Mason (Deputy Rector)  
Dollar Academy  
Dollar  
FK14 7DU  
01259 742511  
[dataprotection@dollaracademy.org.uk](mailto:dataprotection@dollaracademy.org.uk)

Once we have received a written request for data we will respond within 30 days.

### **Making a complaint**

You have the right to complain to the ICO if you feel that we have breached any aspect of GDPR. If you feel that we have not resolved your complaint sufficiently you may contact the ICO via their concerns page [here](#).

## APPENDIX 1 - DEVELOPMENT OFFICE PRIVACY STATEMENT

### Introduction

The privacy and data security of our alumni (known as Former Pupils or FPs), current parents\*, former parents, friends and supporters, collectively our community, is very important to us. This statement specifically relates to data kept and processed within the FP and Development Office. This office works within the school, and in conjunction with the school office and FP Clubs, to engage, inform and foster relations for the mutual benefit of the school and our community.

\*A current parent is defined as an individual whose child has been offered and accepted a place at Dollar Academy.

We want to continue to stay in touch with you and this statement sets out how we use and process your data. We want to be clear about what we collect, why we collect it, what we do with your data and why we do it.

### Control

You are in control of your data and we are committed to making sure that all our communications with you are welcome, secure and what you would reasonably expect based on our pre-existing relationship. At any time you can contact the Development Office with a query, to restrict data processing, or to update your contact preferences. This could include no further contact which we will respect. Minimal information may be retained to make sure we do not contact you inadvertently. Please inform us at the Development Office, Dollar Academy, Mylne Avenue, Dollar, FK14 7DU. The Data Protection Officer can also be contacted at the same address.

### Transparency

Personal data that we hold is stored on secure servers and access is restricted to those and who have received training in data protection.

Personal data held and processed by the Development Department may include:

- Biographical information including your name, gender and date of birth
- Your contact details, contact history with Dollar and communication preferences
- Your education history, both at Dollar and beyond
- Your activities, societies, interests and co-curricular activities while at Dollar
- Your employment details and professional associations
- Your interests and volunteering activities as an alumnus
- Your family and partner/spousal details and familial relationships
- Information you have publicly shared on social media, such as LinkedIn
- Your donation history
- Your attendance at events organised both by Dollar Academy and on behalf of the FP Clubs

Dollar Academy does not have an endowment that underpins our work and our future. We may need to fundraise in order to provide an exceptional education for generations to come and your data may be used to support our future philanthropic ambitions as well as to organise events and provide services.

The communications may include sending out school publications, invitations to events and reunions, and future fundraising literature. Communication may be by post, telephone and increasingly by electronic means. We may use digital tools to monitor the impact of these communications, including email tracking to record when an email we send to you has been opened.

To ensure that our communications with you are relevant to you and to your interests, to better understand you as our supporter and to make appropriate requests for support, we may use additional information where available and legally obtained from external sources to help us.

### **Security and data-sharing with partners**

We promise to respect any information you share with us and keep it secure. All information is held and transmitted securely and (in addition to disclosure as permitted or required by law) may be disclosed on a considered and confidential basis to Governors, employees and/or staff of Dollar Academy. Data may also be transmitted to selected third parties who may provide services such as printers, mailing houses, wealth screening services and consultants. They are required to delete or destroy all such information once they have completed the agreed activities carried out on our behalf. Your data will not be disclosed to external organisations other than those acting as agents for Dollar Academy. We do not sell or share any of our data to third party organisations and we do not retain data any longer than is necessary for the purposes outlined above. We also facilitate communication between Former Pupils but will not release personal contact details without your permission.

### **Basis for processing**

Your pre-existing relationship with Dollar Academy establishes a legitimate interest in our sharing with you news of developments at Dollar, in the social and networking opportunities that we offer to our community and any future fundraising programmes. It is on this basis that we hold the information that you or others have supplied to us, and use it in the manner set out in this document. You will receive our general news, and information about our events and our future fundraising programmes, unless you have asked us not to contact you about certain subjects, or using certain methods (see above).

All personal data is held and processed strictly in accordance with the Data Protection Act 1998, with Dollar Academy's Data Protection Policy and with the General Data Protection Regulations (GDPR). We do not retain data any longer than is necessary for the purposes outlined above. As we may amend this Privacy Statement, any significant changes to either this Statement, or the way we treat your data will be communicated via the Dollar Academy website under Former Pupils, or by contacting you directly.

### **Consent**

As a result of the GDPR we require your consent to send you any communication in an electronic format or via post. You need to opt in with active and informed consent. We will provide you with an opportunity to do this. You can change your mind at any time. You can opt out of receiving information, either by electronic means, postal mail, or both, by writing to us or emailing us on [dollarfp@dollaracademy.org.uk](mailto:dollarfp@dollaracademy.org.uk)

### **Your rights**

You have the following rights;

- To have information erased or inaccuracies corrected
- To make a subject access request
- To prevent direct marketing, to prevent data portability and to prevent automated decision making

## APPENDIX 2 – ADMISSIONS PRIVACY POLICY

**DOLLAR ACADEMY** a registered charity registered in Scotland with SC009888 and whose registered office is at 23 West Burnside, Dollar, FK14 7DZ (the “School”) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This privacy notice is relevant to you if you are applying for a place with us, or you are applying for a place for your child. It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### The kind of information we hold about you

In connection with your application for a place, we will collect, store, and use the following categories of personal information about you:

- For parents or guardians: the information you have provided on our admissions form, including names, titles, relationship to child, addresses, telephone numbers, email addresses, nationality, (and for Tier 4 visa applicants, their passport details).
- For prospective pupils: date of birth, gender, education history, nationality, birth certificate (and for boarders, the photograph page of their passport).
- For both parents/guardians and prospective pupils, any information you provide to us during an interview.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about race, ethnicity, religious beliefs or occupation.
- Information about health, including any medical condition, health and sickness records.
- Information about any special educational needs.

## **How is your personal information collected?**

We collect personal information about prospective pupils from the following sources:

- You, the prospective pupil.
- You, the parents or guardians (or agent) of the prospective pupil
- The pupil's current School, if applicable, from whom we collect the following categories of data: educational attainment; any conduct or other relevant behavioral issues with your current school.

## **How we will use the information about you**

We will use the personal information we collect to:

- Assess the prospective pupil's suitability for attendance at the School.
- Communicate with the parents or guardians (or agent) about the admissions process.
- Communicate with the parents or guardians (or agent) about the school.
- Keep records related to our admissions processes.
- Comply with legal or regulatory requirements.

This is because it is in our legitimate interests to decide whether to admit the prospective pupil, since it would be beneficial to the school to admit appropriate applicants. We also need to process personal information to decide whether to enter into a parental contracts.

Having received your application for enrolment form, we will then process the information to help to decide whether you meet the requirements to be considered for admission to the School. Depending on the age of the child, we may take the results of entrance assessments and interviews into account. We may also base decisions on information regarding educational attainment and conduct or other relevant behavioral issues at current or previous schools.

## **If you fail to provide personal information**

If you fail to provide information that is necessary for us to consider your application (such as evidence of educational attainment), we may not be able to process your application.

## **How we use particularly sensitive personal information**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the admissions process.
- We will use information about race, ethnicity, religious beliefs and occupation, to ensure meaningful equal opportunity monitoring and reporting.

## Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. If you have any concerns about the personal data of you or your child, please contact the Data Protection Officer at [dataprotection@dollaracademy.org.uk](mailto:dataprotection@dollaracademy.org.uk).

## Data retention

### How long will you use my information for?

If a place is not offered, we may keep the personal information supplied for a period of up to twelve months. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against applicants on prohibited grounds and that we have conducted the admissions exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, for example if we cannot currently offer a place but one might become available in the future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

### Rights of access, correction, erasure, and restriction Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal

information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Registrar in writing.

### **Right to withdraw consent**

When you completed the application for enrolment form, you provided consent to us processing your personal information for the purposes of the admissions exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Registrar. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

### **Data Protection Officer**

We have appointed Mrs Victoria Mason (Deputy Rector) to ensure this policy is compliant. If you have any questions about this policy or how we handle your personal information, please contact us at [dataprotection@dollaracademy.org.uk](mailto:dataprotection@dollaracademy.org.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.