

# Policy on the Retention of Alumni Data and Records

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## 1. Purpose

- 1.1 This policy defines the principles, time periods, mechanisms and responsibilities for the Foundation's retention of alumni personal data.

## 2. Definition and scope of alumni personal data and records

- 2.1 'Alumni' in the context of this policy and the records and data held by the Foundation are defined as any individual who has studied at one of the Foundation's schools for an academic year.
- 2.2 Alumni contact details will be held in a separate database, held by the Development Office. Student data will be added to the alumni database on leaving school, or if possible in the preceding term to allow for their integration with the alumni community.
- 2.3 This policy covers all alumni data, information, records and content relating to Foundation business which has been created by Foundation staff or updated directly by individual alumni, and
  - 2.3.1 relates to an identifiable individual (e.g. identified by name and/or contact details)
  - 2.3.2 is kept in any medium or format (e.g. text, sound, image, paper, electronic, document or database)
- 2.4 Generally, alumni records will relate to the management of the relationship between the Foundation and its alumni, for example:
  - 2.4.1 records documenting agreement to receive marketing mailings, etc, and mailings to cohorts of alumni
  - 2.4.2 academic records, records of achievements while at school
  - 2.4.3 individual alumni contact records, e.g. update of details, queries, correspondence relating to donations and bequests.
- 2.5 This policy does not cover data being held on individuals who are not 'alumni' (as defined in section 2.1) but who have been approached by the Development Office as prospective donors to the Foundation. Data on these individuals is held in the same systems as alumni data.

### **3. Legislative and regulatory framework**

- 3.1 The Data Protection Act 1998 requires that alumni records should only be retained for as long as is necessary.
- 3.2 The Data Protection Act 1998 also requires that personal data should be accurate and up-to-date. Alumni are requested to update their personal details regularly and at least on an annual basis.

### **4. Principles for the management and retention of personal data**

- 4.1 The timeframe for retaining personal data must be in line with legislative and regulatory requirements (see section 3) and must meet business requirements. However, the choice of retention timeframes should be kept to a minimum in order to simplify the task of managing large stores of data.

- 4.2 Long term records – indefinite retention

Alumni are requested to update their personal details yearly. In order for the development office to carry out their business functions of keeping alumni up to date with Foundation activities and pursuing donation prospects, it requires alumni contact details and contact history (e.g. donations made) to be held indefinitely. Deceased alumni are marked on the records system so no mailings are sent.

- 4.3 Legal, contractual and regulatory requirements (7 years)

There is a legal/contractual requirement to keep records and data relating to payments for services, e.g. alumni events, for seven (7) years after the activity/ transaction has been completed.

- 4.4 Operational records (up to 3 years)

Data relating to alumni as users of services or day to day administration e.g. correspondence, queries, where the detailed information is not required for contact history (see 4.2). This includes information alumni provide which has time-limited use.

- 4.5 Sharing data with third parties: Personal data owned by the Foundation may, on occasion, be shared with third parties. The third party will be acting as our agent on the basis of Foundation instructions (e.g. data cleaning agencies), and the Foundation remains the data controller. The third party must be contracted to adhere to the Foundation's policies in this area, as well as the UK Data Protection Act 1998 or equivalent legislation. In relation to research projects e.g. those undertaken by data cleaning agencies the contract would usually require them to destroy the data immediately after project completion.

- 4.6 It is good information management practice to destroy information when it becomes redundant. This ensures that retrieving current information is more efficient, and that redundant information is not retrieved in error because it still exists. However data such as the names of former pupils their dates of birth and their times at school should be retained.

## **5 Roles and responsibilities**

- 5.1 The Foundation has appointed Laurence Perry (Bursar and Clerk to the Governors) as the Data Protection Officer (DPO) who will endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998.
- 5.2 The Director of Development is the Foundation officer responsible for alumni data and records within the Foundation.
- 5.3 The Director of ICT provides tools, advice and guidance to ensure that Foundation records are maintained according to legislation and best practice.

## **6. Maintenance of policy**

- 6.1 The Policy, and compliance with the policy, will be reviewed every three (3) years at the instigation of the Data Protection Officer, in line with the Foundation's data and records retention policy. There will be an annual review to ascertain if amendments to the Retention Schedule or policy are required due to changing legislation or business requirements.
- 6.2 The Data Protection Officer may at any time request individual stakeholders to submit a report on their compliance with this policy, in line with the maintenance of the Foundation's data and records retention policy.
- 6.3 All alumni data and records require a robust business reason for them to be kept. If a business reason for the retention of data cannot be articulated, then it should be destroyed. The case must include evidence of the frequency with which this data is referred to over time; and an analysis of the financial or other risk of not being able to refer to the data.

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ACB