



DATA RETENTION POLICY AND SCHEDULE

Statement of Purpose

1. **Britannia International Academy** (the Employer) is committed to ensuring that all personal data handled by us will be processed according to legally compliant standards of data protection and data security.
2. We confirm for the purposes of the data protection laws, that the Employer is a data controller of the personal data in connection with your employment. This means that we determine the purposes for which, and the manner in which, your personal data is processed.
3. **The purpose of this Policy is to help us achieve our data protection and data security aims by:**
 - a. notifying our staff of the types of personal information that we may hold about them, our customers, suppliers and other third parties and what we do with that information;
 - b. setting out the rules on data protection and the legal conditions that must be satisfied when we collect, receive, handle, process, transfer and store personal data and ensuring staff understand our rules and the legal standards; and
 - c. clarifying the responsibilities and duties of staff in respect of data protection and data security.
4. This is a statement of policy only and does not form part of your contract of employment. We may amend this Policy at any time, in our absolute discretion.
5. **For the purposes of this Policy:**
 - a. Criminal records data means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.
 - b. Data protection laws means all applicable laws relating to the processing of personal data, including, for the period during which it is in force, the UK General



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Data Protection Regulation.

- c. Data subject means the individual to whom the personal data relates.
- d. Personal data means any information that relates to an individual who can be identified from that information.
- e. Processing means any use that is made of data, including collecting, storing, amending, disclosing, or destroying it.
- f. Special categories of personal data means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

Data Protection Principles

- 6. Staff whose work involves using personal data relating to Staff or others must comply with this Policy and with the following data protection principles which require that personal information is:
 - a. processed lawfully, fairly and in a transparent manner. We must always have a lawful basis to process personal data, as set out in the data protection laws. Personal data may be processed as necessary to perform a contract with the data subject, to comply with a legal obligation which the data controller is subject to, or for the legitimate interests of the data controller or the party to whom the data is disclosed. The data subject must be told who controls the information (us), the purpose(s) for which we are processing the information and to whom it may be disclosed.
 - b. collected only for specified, explicit and legitimate purposes. Personal data must not be collected for one purpose and then used for another. If we want to change the way we use personal data, we must first tell the data subject.
 - c. processed only where it is adequate, relevant and limited to what is necessary for the purposes of processing. We will only collect personal data to the extent required for the specific purpose notified to the data subject.



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- d. accurate, and Britannia International Academy takes all reasonable steps to ensure that information that is inaccurate is rectified or deleted without delay.
- e. kept only for the period necessary for processing. Information will not be kept longer than it is needed and we will take all reasonable steps to delete information when we no longer need it.
- f. secure, and appropriate measures are adopted by the Employer to ensure this.

Who Is Responsible for Data Protection and Data Security?

- 10. Maintaining appropriate standards of data protection and data security is a collective task shared between us and you. This Policy applies to all staff of Britannia International Academy, irrespective of seniority, tenure and working hours, including employees, directors and officers, consultants and contractors, agency staff, trainees, homeworkers, fixed-term staff and volunteers (“Staff”).
- 11. Questions about this Policy should be directed to the Data Protection Officer.
- 12. All Staff have personal responsibility to ensure compliance with this Policy and to protect data security. Managers are responsible for leading by example and enforcing compliance.
- 13. Any breach of this Policy may result in disciplinary action up to and including dismissal.



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What Personal Data and Activities Are Covered by This Policy?

14. This Policy covers personal data which:
 - a. relates to a living individual who can be identified;
 - b. is stored electronically or on paper;
 - c. includes opinions as well as facts;
 - d. relates to Staff or any other individuals whose data we handle;
 - e. is obtained, stored, transferred, processed or destroyed by Britannia International Academy.

What Personal Data Do We Process About Staff?

24. Britannia International Academy collects personal data which:
 - a. you provide during recruitment or employment;
 - b. is provided by third parties;
 - c. is publicly available.
25. This includes records relating to:
 - a. contact details and next of kin;
 - b. recruitment and qualifications;
 - c. pay, tax, NI, pension and benefits;
 - d. IT and communications use;
 - e. performance, disciplinary and grievance matters.

Sensitive Personal Data

29. Britannia International Academy may process special category personal data only where lawful and necessary.



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30. Processing will only occur where a lawful basis and special condition applies, including explicit consent, employment law obligations, vital interests, public data, legal claims, or substantial public interest.

31–33. Approval from the Data Protection Officer is required before processing.

Criminal Records Information

32. Criminal records information will be processed in accordance with the Criminal Records Information Policy of Britannia International Academy.

How We Use Personal Data

36–37. Personal data is processed strictly for employment and operational purposes including sickness records, IT monitoring, disciplinary processes, performance reviews and equal opportunities monitoring.

Accuracy and Relevance

39–40. Britannia International Academy ensures data accuracy and allows Staff to request corrections.

Storage and Retention

41–42. Data is stored securely in line with the Data Retention Policy and Privacy Notices of Britannia International Academy.



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Individual Rights

43–45. Staff have rights of access, rectification, erasure, restriction, objection and complaint to the ICO.

Requests should be made to Info@britanniaacademy.co.uk.

Data Security

48–54. Britannia International Academy applies technical and organisational security measures including encryption, access controls, secure disposal and breach prevention.

Data Impact Assessments

49–50. Where processing poses high risk, Britannia International Academy will conduct a Data Protection Impact Assessment.

Data Breaches

50–52. Breaches will be reported to the ICO within 72 hours and affected individuals notified where required.

International Data Transfers

51–53. Transfers outside the UK/EEA will only occur where adequate safeguards are in place.



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Individual Responsibilities

52–55. Staff must safeguard data, limit access, and comply with security requirements.

Training

55–56. Britannia International Academy provides mandatory data protection training.

Attribution

57. This Policy was created using a document from Rocket Lawyer (UK).

DATA RETENTION POLICY AND SCHEDULE

Statement of Purpose

6. Britannia International Academy is committed to complying with UK GDPR and the Data Protection Act 2018.
7. This Policy will always defer to current UK Data Protection Law where conflicts arise.
8. Queries should be directed to Adina Tulbure at mrstulbure@britacademy.uk or 07823603136.

Definitions, Interpretation and Scope

7–8. Definitions apply as per UK GDPR and Data Protection Act 2018.



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Legal Justification for Processing

14–15. Britannia International Academy ensures all processing has lawful bases and complies with data protection principles.

Storage Limitation

15–17. Personal data is retained only as long as necessary and deleted or anonymised when no longer required.

Retention Periods

26–29. Retention periods are defined in the Schedule – Retention Periods.

Dealing with Personal Data No Longer Needed

34–38. Data is securely deleted or anonymised. Staff should seek guidance from Adina Tulbure if unsure.

Responsibility



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33–34. Responsibility lies with Adina Tulbure and all Staff Members of Britannia International Academy.

Changes to Policy

38–40. Britannia International Academy may amend this Policy at any time.



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