



Southern Swim Schools and The Swim Surgery Retention of Records

Introduction

Southern Swim Schools is a swim school based at six locations in Hampshire using self-employed swimming teachers and staff to conduct lessons. It also has an office based in Waterlooville with a team of four carrying out admin. Southern Swim Schools was established when Portsmouth Swim School and Springfield Swim Club were merged together. Partners and therefore owners of Southern Swim Schools are Paul Linkins, Lynn Goring-Crook and Julia Spacey.

The Swim Surgery is the training arm of Southern Swim Schools used to train teachers and swimming teachers on behalf of the STA. It uses self-employed freelance tutors and examiners to contact its work. The Swim Surgery was established in 2018 when Southern Swim Schools decided to separate the training side of the business from the main swim school. Partners and therefore owners of The Swim Surgery are Lynn Goring-Crook and Paul Linkins.

Southern Swim Schools and The Swim Surgery is committed to ensuring confidentiality and safe storage of personal or sensitive data for all individuals engaging with an activity with us.

Where information in this, and all other policies, relate to separate documents this is shown in italicised brackets. For example (4—Subject Access Request) refers to document 4 “Subject Access Request” which is available via our website.

Scope

All of Southern Swim Schools and The Swim Surgery’s records, whether analogue or digital, are subject to the retention requirements of this procedure.

Responsibilities

The partners 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 6 financial years after the last re-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 7 years after this would be April 2024

- Registers used at the swimming pools will be destroyed within 30 days of the end of each term.

Training Course Enrolment

- For 6 financial years after the course is completed unless our Awarding Body The Swimming Teachers Association requires different retention rates. Where this is the case you will be informed on booking your course.
- For example should your course be in June 2017 this is in the 2017 to 2018 financial year and so 6 years after this would be April 2024.

Employees—pay information

- Bank information is removed within 90 days of staff ended employment with us
- Contracts, pay slips, qualifications and all other personal information is removed 6 financial years after employment ends.
- For example should you end work with us in April 2018 this is the 2018—2019 financial year and so 6 years after this would be April 2025.
- 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 6 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

- Data can only be removed once the swimmer no longer swims. Once the request has been made we will remove information within 30 days.

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 Body The Swimming Teachers Association) 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) Southern Swim Schools and The Swim Surgery 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.

This policy was approved by the Company Partners on 24th May 2018 and is issued on a version controlled basis under the signature of Lynn Goring-Crook.

Date	Version	Author	Amendment Details
14/5/2018	1.0	Lynn Goring-Crook	Creation of document
24/5/2018	1.1	Lynn Goring-Crook	Intro edited and document checked

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