



Data Retention Policy

Monitoring and Review

	Name	Date	Role
Prepared by	Charlie Jewell	01/08/2022	Programme Manager
Reviewed by	Kathryn Parrott	01/01/2023	Associate Consultant
Next review	Charlie Jewell	31/08/2024	Programme Manager
Reviewed by	Charlotte Potter	01/09/2023	Trustee
Reviewed by	Charlie Jewell	01/10/2023	Programme Manager
Reviewed by	Charlie Jewell	01/09/2024	Head of Programmes
Reviewed by	Rachel Montgomery Syreeta Allen	11/06/2026	Head of HR Strategy & Impact Director

The Axiom Maths data retention schedule ensures the retention of business information for as long as is needed. The main aim of this guidance is to enable Axiom Maths to manage records effectively and in compliance with data protection and other regulations. As an organisation we collect, hold, store and create significant amounts of data and information, and this policy provides a framework of retention and disposal of categories of information and documents.

Axiom Maths is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned. The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.

Section two sets out the agreed retention periods for each type of personal data held. The legal retention period is also provided for information, as in some cases Axiom Maths has made the decision to retain data for periods longer than legally mandated.

Section three of this policy sets out the destruction procedure for documents at the end of their retention period. The designated Data Protection Lead for Axiom Maths shall be responsible for ensuring that this is carried out appropriately. The Axiom Maths Data Protection Officer can be contacted if there are any questions regarding this policy (info@hope-may.com) as can Axiom Maths Data Protection Lead (info@axiommaths.com).

If a document or piece of information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to the Axiom Maths Data Protection Lead who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

Document category and basic description	Retention Period	Legal Retention Requirement	Reason for Retention
Corporate/Constitutional			
Trustee / director minutes of meetings and written resolutions	Permanent	Recommended at least 10 years	Companies Act 2006 Charities Act 2011
Documents of clear historical / archival significance	Permanent	Permanent (if relevant data protection regulation provisions are met).	Data Protection regulation
Fundraising donor information	Permanent	7 years of financial data (including 6 years for Gift Aid) for existing donors	Financial Auditing and Charities Commission
Insurance			
Claims correspondence	3 Years after settlement	3 Years after settlement	Commercial
Health and Safety			
Accident books / records and reports	For adults: 6 years after last entry or end of investigation	3 years after last entry or end of investigation	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995
Pension Records			
Records about employees and workers	15 years from end of current tax year		As specified by Local Government pension providers
Employees/Administration			
Employee contact details	6 years from end of current tax year	6 years from end of current tax year	
Payroll / Employee / Income Tax and NI records, including maternity and sick pay records	6 years from end of current tax year	6 years from end of current tax year	
Foreign national ID documents	6 years from end of current tax year	Minimum 2 years from end of employment	Immigration (Restrictions on Employment) Order 2007
HR files and training records	6 years from end of employment	Maximum 6 years from end of employment	Limitation Act 1970 and Data Protection regulation
Temporary/ Freelance staff data, including contact details, bank details and performance details	6 years from end of employment / participation	Maximum 6 years from end of employment / participation	Limitation Act 1970 and Data Protection regulation

Document category and basic description	Retention Period	Legal Retention Requirement	Reason for Retention
Records re: working time	6 years from end of current tax year	2 years	Working Time Regulations 1998 as amended Decision to retain longer than legal requirement in order to perform network level analysis of working patterns.
Job applications (CVs and related materials re unsuccessful applicants)	9 months from the notification of the outcome of an application	Recommended: 6-12 months from your notification of outcome of application	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976
Job applications (CVs and related materials re unsuccessful applicants) – if agreed we can keep their details on file.	2 year from the agreement that we can hold their data on file		ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976
Pre-employment / volunteer vetting	6 months beyond last date of interaction	6 months	ICO Employment Practice Code
Volunteer records (for volunteers working directly with Axiom Maths, not our volunteer mentors)	Evaluated on a case-by-case basis, depending on involvement with children	Undertake assessment to decide on retention period taking account of risk (e.g., safeguarding re: work with children)	
Disclosure & Barring Service checks	Record only whether result is satisfactory / unsatisfactory and delete other information. If copy is kept, not to be retained beyond 6 months.	Record only satisfactory / unsatisfactory result and delete other information. If copy is kept, not to be retained beyond 6 months. See further DfE statutory Guidance 'Working Together to safeguard children	Single Central Record Requirements for maintained schools: Regulations 12(7) and 24(7) and Schedule 2 to the School Staffing (England) Regulations 2009 and the School Staffing (England) (Amendment) Regulations 2013 (applied to pupil referral units through the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007)

Document category and basic description	Retention Period	Legal Retention Requirement	Reason for Retention
Pupils			
Contact details, school details, date of birth, UPN and demographic Data	This data is kept for all children who start the Maths Circles programme, and then until the end of the academic year in which they turn 25 years of age.		Normal standard practice is 2-3yrs. However, as we are targeting an increase in PhD students, we need to track student progress up to the age which students potentially enrol on a PhD. We therefore need this information until they turn 25.
Attendance registers	Attendance data kept for all children who start the Maths Circles programme, and then until the end of the academic year in which they turn 25 years of age.	3 years from when the register entry was made if made in paper registers. For computerised registers retain until 3 years after the end of the school year during which the entry was made. This applies to every back up copy.	Pupil Registration Regulations 2006 Regulation 14. Normal standard practice is 3yrs. However, as we are targeting an increase in PhD students, we need to track student progress up to the age which students potentially enrol on a PhD. We therefore need this information until they turn 25.
Safeguarding Reporting Forms, disclosures or other communication relating to the safeguarding of children on the programme.	Reporting Form securely disposed of immediately after sharing with DSL at the school/DP, with log (inc. student initials, date, name of school, session lead, who reported it, DP if applicable) for current academic year plus 1 year.	'Keeping children safe in education Statutory guidance for schools' and 'Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015'	To ensure that Axiom Maths is aware of previous safeguarding reports, in case future reports are written and need to be referred to/should impact the action taken.
Other items e.g., curriculum related, photographs, video recordings	Current academic year plus 1 year, unless consent given for us to use the images for branding/communications	Look at why you are processing this and how long you need it for. Make sure you have a good justification for keeping it.	Case by case basis

Document category and basic description	Retention Period	Legal Retention Requirement	Reason for Retention
Parents			
Parent contact details	Current academic year plus 1 year after their child has left the programme.	Usually, for the duration that the parent has a pupil at the school. Otherwise, subject to case-by-case justification.	Pupil Registration Regulations 2006 For basic name and contact details.
Mentors			
Mentor contact details and employment and academic history	Anonymised after 6 years from end of employment/participation in the programme		For long-term evaluation of the programmes and management requirements beyond contracted period.
Mentor performance, attendance and feedback	Anonymised after 6 years from end of employment/participation in the programme		For long-term evaluation of the programmes and management requirements beyond contracted period.
Mentor bank details/payroll file	6 years from end of employment/participation in the programme		
Volunteers			
Volunteer contact details and school	Anonymised after 6 years from end of participation in the programme		For long-term evaluation of the programmes and management requirements beyond contracted period.
Partners – organisations, schools and MATs (participating and potential)			
Staff contact details	2 years from end of partnership/participation or first contact (whichever is most recent) in the programme		
Bank details	6 years from end of employment/participation in the programme		

Performance details	6 years from end of employment/participation in the programme		For long-term evaluation of the programmes and management requirements beyond contracted period.
Website Enquiries and Newsletter Sign-Up			
Website Enquiries	2 years from the date of receiving the enquiry.		To ensure Axiom Maths has time to respond to queries, particularly those requesting to sign up for the programme, which may not be possible at the time of enquiring.
Newsletter Sign-Up	Until individual 'unsubscribes' from the Axiom Maths newsletter.		Axiom Maths will keep individuals up to date about the organisation and programme until they decide they no longer want to receive the newsletter.
Alumni/Alumnae			
Alumni contact and personal details	While consent is valid		Data Protection Act 2018
Governance			
Whistleblowing documents	Current academic year plus 6 years after the outcome	6 months following the outcome	Public Interest disclosure Act 1998
Subject access request documents	Current academic year plus 12 months following completion of the request	12 months following completion of the request	Data Protection Act 2018
Freedom of Information request and Environmental Information Regulation request documents	Current academic year plus 2 years following completion of the request		Data Protection Act 2018
Complaints	Current academic year plus 6 years following resolution of the complaint	Retain for longer in the case of contentious disputes	