

Student Data Retention & Deletion Procedure

Review date: July 2027

Why do we have this procedure?

This procedure explains how The Day identifies, reviews and deletes student-related personal data that is no longer required. It supports the Data Handling Policy and is intended to make sure that information is not kept simply because it is available.

Scope

This procedure applies to student-related personal data held in The Day's operational systems, marketing and lead-generation systems, and other systems used on behalf of The Day. Where The Day is processing student data on behalf of a school, deletion and retention will also follow the relevant data processing agreement and the school's documented instructions.

Important distinction

Student records used to provide The Day's services are different from student information that enters our marketing, project management or lead-management systems through forms or emails. A student account or service record should not be deleted simply because the person is a student. It should be retained only for as long as it is needed for the agreed purpose and in line with the applicable retention period, partnership data agreement, or customer instruction.

Current student-data cleanup process

The Day currently receives some information through forms used for trials, demonstrations, quotations, partnership projects and other communications. Where an individual identifies themselves as a student through a job-title field, this information is treated as requiring review and, where appropriate, removal from marketing or lead-management systems.

Spirit

Where a form submission enters Spirit and the job title indicates "Student", the record is reviewed. Records that are clearly student records are removed from the relevant lead-management database. The previous process used a Spirit tab labelled "GDPR", which was checked every two weeks. The process should continue to be performed at least every two weeks unless the system is changed to provide an equivalent automated control.

Records such as "Generic student log in" or similar descriptions may relate to a member school rather than an individual student. These should not be deleted automatically and should be checked before removal.

Dotdigital

Where a person identifies themselves as a "Student" on a form feeding into Dotdigital, the record is selected for deletion from marketing databases during the annual student-data cleanup. The current cleanup takes place in August, subject to operational needs and any agreed exceptions. Student records should also be suppressed from marketing campaigns as soon as they are identified.

Email suppression

Any record identified as a student must be suppressed from marketing activity in Dotdigital and any equivalent marketing system. The aim is to prevent student records being used for direct marketing even where the underlying record has not yet reached its scheduled deletion date.

Google spreadsheets

Any record identified as a student stored in a Google Spreadsheet for the purposes of partnership projects, for example Youth Councils, should be reviewed every August during the data clean-up. Student data should be deleted if it's no longer needed, or in line with the data agreement put in place for the partnership.

How the procedure should be carried out

- Identify records that meet the student-data review criteria, including records where "Student" has been selected or entered in a relevant job-title or role field.
- Check the record before deletion. Do not remove school, teacher or organisation records simply because they contain the word "student" in a description that relates to a school service.
- Suppress any confirmed student record from direct marketing immediately.
- Delete the confirmed student record from marketing or lead-management systems in line with the retention schedule and any applicable contractual requirements.
- Record the date of the review, the system checked and any exceptions or decisions that require follow-up.
- Escalate uncertain cases to the Data Protection Compliance Manager rather than making an assumption.

Requests for deletion

If a student, parent, school or other person asks The Day to delete personal data, this should not be handled informally as a routine database cleanup. The request must be referred to the Data Protection Compliance Manager so that The Day can determine whether it is a valid data protection request, whether an exemption applies, and whether The Day is acting as controller or processor for the relevant data.

Deletion and backups

Deletion should be carried out from live systems where the data is no longer required. Information held in backups or archives should be treated in accordance with The Day's security, retention and backup arrangements. Where immediate deletion from a backup is not technically possible, the data should be put beyond normal use and removed in accordance with the next appropriate deletion cycle.

Records of deletion

The person carrying out a scheduled cleanup should keep a simple record of the date of the check, the system reviewed, the number or type of records removed, and any exceptions. The record should contain no more personal information than is necessary to demonstrate that the process has been completed.

Responsibilities

The Data Protection Compliance Manager is responsible for overseeing this procedure and ensuring that it remains consistent with the Data Handling Policy, relevant data processing agreements and the organisation's retention arrangements. Team members who manage Spirit, Dotdigital or other systems are responsible for completing the scheduled checks and escalating anything they are unsure about.

Review and changes to systems

This procedure will be reviewed at least annually and whenever there is a significant change to The Day's systems or the way student data is collected or used. Where a manual process is replaced by an automated deletion or suppression control, this procedure should be updated to describe the new control and the evidence retained to show that it is operating effectively.