



Data Retention Policy

1. Purpose

This policy sets out how Sharpe Academy of Theatre Arts Ltd retains and manages personal data.

The Academy is committed to ensuring that personal data is:

- Kept only for as long as necessary
- Securely stored and managed
- Deleted or anonymised when no longer required

This policy should be read alongside the Academy’s Data Protection and Privacy Policy.

2. Principles of Data Retention

The Academy follows these principles:

- **Data minimisation:** Only necessary data is retained
- **Storage limitation:** Data is not kept longer than required
- **Security:** Retained data is protected appropriately
- **Accountability:** Retention decisions are documented and reviewed

Retention periods are based on:

- Legal and regulatory requirements
- Safeguarding considerations
- Operational needs
- Legitimate interests

3. Retention Schedule

Data Type	Retention Period	Basis
3.1 Students (Part-Time and College)		
Enrolment records	Duration of enrolment + 6 years	Legal, safeguarding, operational
Attendance records	Duration of enrolment + 6 years	Safeguarding, operational
Progress and assessment records	Duration of enrolment + 6 years	Operational, legitimate interests
Medical and emergency information	Duration of enrolment + short period after leaving (max 1 year unless required longer)	Safeguarding
Safeguarding records	As required by safeguarding obligations (may exceed standard retention periods)	Legal obligation
3.2 Parents and Guardians		
Contact details	Duration of student enrolment + 6 years	Operational, safeguarding
Communication records	Duration of enrolment + reasonable period after (up to 6 years where relevant)	Legitimate interests
3.3 College Students (Additional Data)		
Application and audition records	Up to 1 year if not enrolled	Legitimate interests
Academic records	Duration of enrolment + 6 years	Operational, legitimate interests

Data Type	Retention Period	Basis
3.4 Agent Sharpe Clients		
Representation records (CVs, headshots, contracts)	Duration of representation + 6 years	Contract, legitimate interests
Audition and submission history	Duration of representation + reasonable period after	Legitimate interests
3.5 Customers (Sharpe Dancewear)		
Order and transaction records	6 years	Legal (tax/accounting)
Customer contact details	Retained while active, or until no longer required	Legitimate interests
3.6 CCTV Data		
CCTV recordings (video only)	Approximately 30 days	Legitimate interests, safeguarding
Incident footage	Retained as long as necessary for investigation	Legal, legitimate interests
3.7 Administrative and Financial Records		
Financial records (invoices, payments)	6 years	Legal obligation
Contracts and agreements	Duration of contract + 6 years	Legal, contractual
Internal administrative records	As required for operational purposes	Legitimate interests
3.8 Unsuccessful Enquiries and Trials		
Trial class and enquiry data	Deleted after trial if no enrolment, unless needed to prevent duplicate trials	Legitimate interests

4. Data Disposal

When personal data is no longer required, it is disposed of securely.

This includes:

- Secure deletion from digital systems
- Permanent removal from storage systems where possible
- Secure destruction of paper records (e.g. shredding)

Confidential waste is handled using secure disposal procedures.

5. Anonymisation

Where appropriate, personal data may be anonymised rather than deleted.

This may include:

- Historical records
- Statistical or reporting data

Anonymised data does not identify individuals and is no longer considered personal data.

6. Review

This policy is reviewed regularly to ensure:

- Retention periods remain appropriate
- Legal and regulatory requirements are met
- Data is not retained unnecessarily