

Personal Data Retention Schedule

Function – Customer Records				
Record	Description	Retention	Format	Notes
Student Record: Pre-2002	Skeletal record of a student's previous study.	Indefinitely	Electronic	Student, benefactor and dependant information is currently retained on an indefinite basis within SAAS. SAAS has obligations to ensure that personal information is retained in line with a range of regulatory and business requirements. SAAS is progressing an updated retention schedule to ensure that student data is only retained as long as necessary. This retention schedule is an active document and will be updated on an on-going basis. Please refer back to this schedule for the most up-to-date position with regard to information held on the student record.
Student Record: 2002-2011 (includes benefactor information, dependant information)	Includes student's personal information, funding history, course information, higher education attendance data, funding payment history, documentation supplied as part of applications for funding, correspondence in relation to application for funding. If a student made a complaint or appeal a copy of the original request and final response is attached to the student record.	Indefinitely	Electronic	
Student Record: 2011 – (includes sponsor information, dependant information)	Includes student's personal information, funding history, course information, and higher education attendance data, funding payment history, evidence and documentation supplied as part of applications for funding for each session. If a student has made a complaint or appeal a copy of the original request	Indefinitely	Electronic	

	and final response is attached to the student record.			
General customer correspondence	Paper applications and general correspondence received by the agency which have been scanned into Electronic Document Management System	Destroy paper records 30 days after receipt	Paper	Scanned records are held on the student record.
	General correspondence received by the agency which is allocated to a student record.	Deleted from inbox within 30 days of response.	Email	Attach a copy of original enquiry and response to student's record
	General correspondence received by the agency not allocated to a student record	Deleted from inbox within 30 days of response.	Email	Keep a copy of request and response in general correspondence files
General Correspondence Files	Files containing general enquiries and responses not allocated to a student record	Retain for current session + 1 further year	Electronic	Business Need
Telephony records	Telephone calls recorded in the Contact Centre.	4 year - Destroy	Electronic/Audio	Currently calls are only held to August 2016 Calls are not held if transferred from the contact centre to another business area. No calls are recorded where received into or out of other business areas in SAAS. Business Need

Student Online Account	Student's profile which includes personal information and most recent course information. Copy of most recent application and award notice and award notice from previous session	Online Account is active for the session funding is applied for. An account is archived if a student does not continue into a new session.	Online	Business Need
Learner records held on Individual Learning Account (ILA) Scotland		Archived pending disposal action		ILA is no longer scheme that SAAS administer. Records have been archived pending disposal decision by Data Controller
Learner Provider records on Individual Learning Account (ILA) Scotland		Archived pending disposal action		ILA is no longer scheme that SAAS administer. Records have been archived pending disposal decision by Data Controller
Debt Recovery Cases including	Records in relation to the management of the recoveries of debt in relation to overpayments. Individual case files include personal and financial information, circumstance of surrounding recoveries action, correspondence with debtor, and any third parties, notes of any action taken, record of repayments received.	Electronic archived 6 years after repayment or write-off Paper record destroyed 6 years after repayment or write-off	Paper and Electronic	Business Needs
Fraud Investigations Case Files	Individual Fraud cases	6 years - Review	Paper and Electronic	Business Need
Complaints and Appeals Case files	Case files in relation to complaints and appeals work, includes all correspondence.	10 years - Destroy	Electronic	Business Need

Function – Access to Information				
Topic	Record Type	Retention	Format	Notes
Data Protection	Casework Files: Data Protection Request including Subject Access. File includes contact details of requester and any other personal information provided. Copies of all correspondence between SAAS and requester, notes of internal decision making, consideration of any exemptions which may apply and if a Subject Access Request a copy of all personal data held by SAAS and sent in response to such a request.	Destroy 5 years after closure of case.	Electronic	Business Need/Compliance
	Evidence provided to confirm identity as part of data protection request	Destroy after request is completed (within 30 calendar days) unless a review is requested. If review is requested retain until review is complete (within 40 working days of completion of original request) unless possibility of appeal to the ICO. If possibility of appeal retain until action is completed.	Paper and Email	Business Need/Compliance
	Data Protection Requests	Delete once attached to casework file.	Paper and Email	Business Need/Compliance
Freedom of Information	Casework file detailing FOI requests and responses, consideration of exemptions and subject internal	Destroy 4 years after closure of case	Electronic	Business Need/Compliance

	<p>reviews and appals. Each case file is likely to contain personal data as defined under the Data Protection Act, 2018 including: name, address and other contact information of the applicant.</p>			
	<p>Freedom of Information Requests</p>	<p>Delete once attached to casework file.</p>	<p>Paper and Email</p>	<p>Business Need/Compliance</p>