

Retention and Disposal Policy for CIAG Individual Customer Records in Microsoft Dynamics 365 – Customer Support System (CSS)

Descriptor	Changes made	Date	Version
Circulated for approval		July 2022	3.0
Circulated for approval		August 2022	3.1
Final version - approved	Revisions from Patricia Thomson and Malcom Greig Confirmation from Pauline Stratford/Greg Hiddleston of age criteria to 26 th Birthdate for Care Experienced. Addition of reference documents to evidence this. Process map updated to reflect this	September 2022	3.2
Transferred to new template	New template	May 2023	3.3
updates	Update to terminology (enterprise data warehouse to modern data platform) Move some policies from SDS policy to Legislative policy	June 2023	3.4
Regular review for Board	Updates to names and roles Updates to wording re Modern Data Platform Removal of longitudinal rules (applicable in other systems)	May 2025	3.5

Name of policy being superseded (if applicable)	n/a
Related policies	See section 3
Related SOPs	See section 3
Related Guidance	See section 7
Equality Impact Assessment completed	No – confirmed not necessary

Island Community Impact Assessment completed	No – confirmed not necessary
Intended Audience	See Distribution/contributors below
For publication	Internally and externally
Team responsible for policy	Business Systems
Policy owner contact details (email)	Gillian Ireland Gillian.Ireland@sds.co.uk
Policy due for review (date)	May 2027

Distribution/Contributors

Name	Title
Patrick Watt	Head of Evaluation & Research
Gillian Ireland	Business Systems Development Manager
Pamela Hagan	Head of Business Systems
Carol Malcolm	CRM Business Partner - CSS
Judith Kavanagh	CIAG Planning and Performance Manager
Karen McBeth	National CIAG Planning and Performance Manager
Taylor Stewart	Senior Manager 16+ Datahub
Conor McGarvey	Performance Analyst Team Leader
Scott Webster	Data Engineering Manager
Aaron O'Hare	Data Protection and Resilience Executive
Kenneth Parker	Information Governance Adviser
Lynne Robson	Head of Evidence and Impact
Graeme Smith	Evaluation and Research Executive
Zoe MacKay	Evidence and Impact Co-Ordinator
Ian Bruce	NTP Equality Manager

Policies should have a clear purpose and perform at least one of the following functions. Please identify all the functions this policy performs.	If statement applies, please mark with an X below
Outline how we allocate limited resources to deliver services or outcomes	
Outline how SDS adheres to legislation, statutory duty etc.	x
Ensure fair and consistent allocation of benefits	
Protect organisational assets, including data	x
Define expectations around the employee/employer relationship	
Other (please specify)	

Contents

1. Policy summary 4

2. Policy purpose and objectives 4

3. Strategic context 5

4. Definitions 5

5. Scope..... 6

6. Policy detail..... 6

7. Further guidance..... 8

1. Policy summary

This document outlines the policy for data storage in CSS; the high-level business rules to be applied for retention and disposal of records on CSS. Note that the documents that are stored against a CSS record follow a different set of retention and deletion rules as per [Retention and Storage of Documents on CSS](#) available on Connect.

2. Policy purpose and objectives

SDS is authorised to hold and maintain records of customers up to the age of 26 under the Post-16 Education (Scotland) Act 2013 and is obliged to maintain all customer records in line with UK Data Protection legislation

SDS uses its Customer Support System (CSS) which is based on Microsoft Dynamics CRM to capture details of customers, customer engagements and to provide data for reporting. The SDS Modern Data Platform extracts and anonymises data from CSS to enable longitudinal analysis of customer data.

This policy was originally developed to ensure compliance with the General Data Protection Regulation in 2018 and was then reviewed and updated in 2022 to ensure ongoing compliance with UK Data Protection legislation.

3. Strategic context

Relevant Legislation and SDS Policies

Legislation

Children And Young People (SCOTLAND) ACT 2014: Statutory Guidance on Part 9: Corporate Parenting

UK General Data Protection Regulations (GDPR)

Data Protection Act 2018

Young Persons Involvement in Education and Training Order (2014)

Post-16 Education (Scotland) Act 2013

Public Records (Scotland) Act 2011

Children's and Young People (Scotland) Act 2014

Education (Additional Support for Learning) Act 2009

Equality Act (2010)

No One Left Behind

Young Person's Guarantee

Opportunities For All

SDS Policy

SDS Records Management Policy

Client Confidentiality and Code of Practice

Data Protection Policy

SDS Privacy Notice

Information Technology and Systems Use Policy

SDS Policy on the use of Protective Markings

Code of Conduct Policy

Children and Vulnerable Adult Protection Policy

National Training Programmes Guidance

Freedom of Information Policy

Complaints Policy

Disclosing Information Policy

As a result of the above legislation and subsequent policies, some of our data sharing is carried out under the legal basis of public task. Therefore, we do not ask customers for consent to process their personal data in the majority of cases. The mechanism for communicating what we do with personal data is stated within our privacy notices. Where new customers are working with SDS, they are made aware of the principles SDS applies relating to the retention and processing of personal data through the relevant SDS Privacy Notice. This is recorded in CSS when the customer has been made aware of this.

Where individuals participate in training programmes which are part of the apprenticeship family, a data sharing agreement is in place (OCSP Data Sharing Agreement No: 01881P). This agreement covers the sharing of personal data between The Skills Development Scotland Co. Limited and The Scottish Government. On completion of an apprenticeship, specific datasets are retained for longitudinal tracking.

4. Definitions

None required

5. Scope

The scope of this policy applies to all Individual Customer Records captured in CSS.

Application	CSS Application Owner	Title
CSS	Pamela Hagan	Head of Business Systems

SDS Services	CSS Information Asset Owner	Title
CIAG	Judith Kavanagh	CIAG Planning and Performance Manager

6. Policy detail

Default Retention Schedule

Following subordinate legislation passed for the Post-16 Education (Scotland) Act 2013, the following became the core CSS retention schedule:

The full dataset for a customer is held for no longer than the date of the individual's 26th birthday unless SDS is currently engaged with the individual (see process map below). In which case, the data is held for no longer than three years from the date of the last recorded update.

Data may be held in Modern Data Platform for longer periods for use in longitudinal analysis and wider reporting requirements. This will be managed by retention and deletion rules for that system.

Retention of Information on Young People with Additional Support Needs and Care Experience

The Education (Additional Support for Learning) Act 2009 provides the legal framework for preparing and supporting the transition of pupils identified with additional supports needs beyond school. SDS has a statutory duty to assist the school where this is appropriate to our role. Information about the needs of these pupils, relevant to supporting their transition, must be shared with SDS by the school and will be held in CSS.

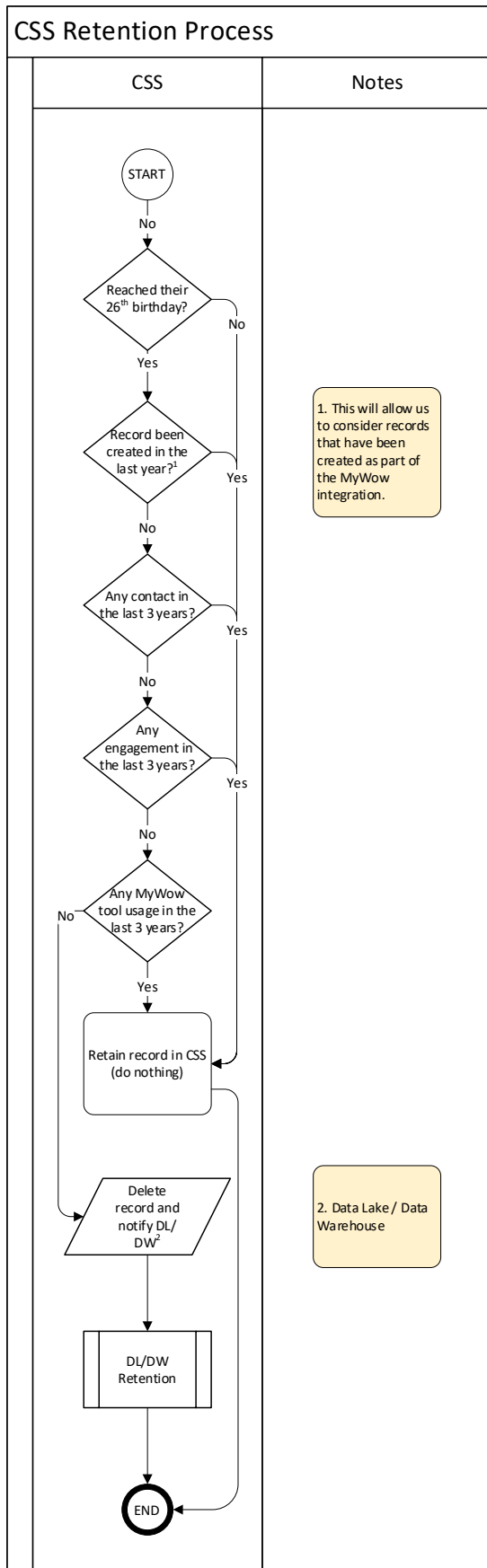
The retention policy will maintain records for all individuals until their 26th birthday, which aligns with the requirements set out in the Children and Young People (Scotland) Act 2014¹. There is no other legislation or Scottish Government ask (requesting that services are extended to specific customer groups of an older age).

Deletion Process

When the retention date is reached the record will be deleted from CSS and a notification sent to Modern Data Platform where the relevant retention policy will then be applied.

¹ Ref - Children and Young People (SCOTLAND) ACT 2014: Statutory Guidance on Part 9: Corporate Parenting

Process Map



7. Further guidance

The Briefing Paper [Retention and Storage of Documents on CSS](#) published on Connect, details the documents which can be stored against a customer's record.

All documents, stored within or outside of the system, should be treated in the same manner as the identified record when being actioned.

A Quick Start Guide for staff [Deleting Attachments on Customer Records](#) is published on Connect.