

Data Retention Policy 2025 - 2026

Equality Impact Assessment: Askham Bryan College recognises the importance of the Equality Act 2010 and its duties under the Act. This document has been assessed to ensure that it does not adversely affect staff, students or stakeholders on the grounds of any protected characteristics.

1. DOCUMENT HISTORY

Date of Issue: 2nd December 2025 Approved on: 22nd October 2025

Next review: June 2026

Owner: Deputy Chief Executive Officer Author: Legal and Compliance Adviser Publication requirements: PUBLIC

2. PURPOSE

- 2.1 The purpose of this policy is to establish clear rules for how long the College keeps different types of data. This ensures the College meets its legal and regulatory requirements. It improves data management by keeping data organised and accessible and reduces operational costs and risks by securely disposing of unnecessary data.
- 2.2 As a general rule, Personal Data must not be stored longer than is necessary for the purposes for which that data was originally obtained and processed.
- 2.3 That said, there may be circumstances where Personal Data should be retained for longer, for instance, to protect the College, its staff and its reputation, in the event of possible litigation or claim on the College's insurance ("legal hold"), in which case destruction may be paused if the legal action is threatened or imminent or for Safeguarding purposes. The College has also taken a policy decision to retain documents relating to the Corporation and its governance indefinitely.

3. SCOPE

| 3.1 | This | Poli | icy | appl | ies | to | all | staff, | across | all | sites | 3. |
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4. HOW LONG IS DATA TO BE KEPT FOR

- 4.1 Unless otherwise advised, or legal hold applies, Personal Data of the category types referred to in the Schedule at Appendix A should not be retained for longer than is stated in that Schedule.
- 4.2 Each period that a record is to be kept known as the "retention period" is to be kept for that period <u>plus 1 year</u>, to enable the secure destruction of that record(s) within that year.
- 4.3 In the case of paper records, these will be securely destroyed by an ISO27001:2013 and GDPR compliant document management and confidential waste solutions provider, who can provide proof of a full audit trail on request including certificates confirming document destruction and all of their staff will have been securely vetted. Electronic Personal Data will be either anonymised or pseudo-anonymised.
- 4.4 "Pseudo-anonymisation" means (re)processing the data in such a way that the Personal Data can no longer be attributed to a specific individual (or "Data Subject") without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the Personal Data is no longer attributable to an identified or identifiable natural person.

5. GENERAL CONSIDERATIONS

- 5.1 Unless there is a justifiable reason to keep information for longer than specified, i.e. for safeguarding reasons, threat of legal action or imminent legal action (in which case destruction may be paused), Personal Data of the category types referred to in the Retention Schedule exhibited as Appendix A to the College's Retention Policy should not be retained for longer than is stated in that Schedule.
- 5.2 Each period that a record is to be kept known as the "retention period" is to be kept for that period <u>plus 1 year</u>, to enable the secure destruction of that record(s) within that year.
- In the case of paper records, these will be securely destroyed by an ISO27001:2013 and GDPR compliant document management and confidential waste solutions provider, who can provide proof of a full audit trail on request including certificates confirming document destruction and all of their staff will have been securely vetted.
- 5.4 There will be an annual review of all records to note which require destruction that year in accordance with the Retention Schedule set out in the College's Retention Policy.
- 5.5 It will be the responsibility of the Information System Owners and their teams to ensure deletion (in the case of electronically stored data) and or destruction (in the case of physical files) in accordance with the Retention Schedule and the College's Retention Policy.

5.6 If any Personal Data has been shared with a third-party organisation, they should also be contacted and asked to delete/destroy that data as well and provide confirmation to the College that they have done so.

6. ELECTRONIC FILES

6.1 Electronic Personal Data will be either anonymised or pseudo-anonymised. "Pseudo-anonymisation" means (re)processing the data in such a way that the Personal Data can no longer be attributed to a specific individual (or "Data Subject") without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the Personal Data is no longer attributable to an identified or identifiable natural person".

7. DISPOSAL OF RECORDS (OTHER THAN ELECTRONIC FILES)

- 7.1 When records that are not electronic records have reached their retention period, they will be disposed of securely and confidentially.
- 7.2 All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructable:
 - paper records should be placed in the confidential waste bins located on site and will
 then be shredded by an external company. Where there is a mix of confidential
 papers and non-confidential papers, first separate the documents. Confidential
 documents should be shredded or sent to a secure confidential waste disposal
 service, while non-confidential documents can be recycled through regular
 channels. If in doubt, dispose of everything securely in the confidential waste
 bins. If the bins are full, please ask Estates for some confidential waste bags.

Do not put any paper records in with the regular waste or a skip:

- CDs/DVDs/floppy disks should be cut into pieces before being disposed of. For added security, do not put all of the pieces in the same waste bin – ideally spread the pieces across separate collections;
- audio/video tapes should be dismantled and shredded;
- hard disks should be dismantled and sanded.
- 7.3 For further information, see Record keeping and retention information for training providers GOV.UK (www.gov.uk)

8. DISCIPLINARY ACTION

| 8.1 | A deliberate breach of confidentiality, i.e. when confidential information is deliberately |
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| | disclosed to a third party without consent, will be subject to disciplinary action under |

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the Staff Disciplinary Policy and Procedure. An accidental breach will not normally be subject to disciplinary action, unless this amounts to gross misconduct.

9. DEPARTMENT FOR EDUCATION

9.1 The Department for Education ("DfE") requires colleges to retain data for learners, covering eligibility, qualifications, and funding evidence, and for staff, buildings, and finances. Additionally, they must publish information online about their curriculum, policies, staff, and financial information.

What is the minimum information that should be kept?

- 9.2 As a minimum the College will keep a learner file for each learner which will contain:
 - evidence about the learner, e.g. proof of identity;
 - evidence of eligibility for funding;
 - · evidence of qualifications/course studied and achieved;
 - European Social Fund (ESF) financial information as detailed in ESF guidance (if applicable).
- 9.3 It is also recommended the College keeps details of:
 - course studied;
 - academic year;
 - ESF contract number (if applicable);
 - destruction date (six years plus current from date study started, or 31/12/2034 if ESF-funded).
- 9.4 ESF records must be easily identifiable, and it is recommended that they are kept separately.

How long should the College keep this information?

9.5 Learner files should be retained securely for 6 years from Financial Year End after last payment made or until 31 December 2034 if ESF-funded provision.

European Social Fund

9.6 For learner files relating to ESF training provision, the College and any subcontractors will follow the retention of documents guidance as detailed in the ESF 2014 to 2020 funding rules (see https://www.gov.uk/government/publications/esf-funding-rules for further details).

10. DATA PROTECTION OFFICER

- 10.1 The College Senior Leadership Team has overall responsibility for ensuring compliance with data protection legislation and its associated policies and procedures and has appointed a Data Protection Officer, who is the Deputy Chief Executive Officer.
- 10.2 The Data Protection Officer will lead on the College's overall approach to data protection, assisted by the Legal and Compliance Adviser and the Head of IT.
- 10.3 In addition, the College's Data Protection Officer, assisted by the Legal and Compliance Adviser and Head of IT, will monitor internal compliance with GDPR and the Data Protection Act 2018, and provide advice on data protection issues and how it impacts the College and its activities, and act as a contact point for Data Subjects and the supervisory authority, the ICO.
- 10.4 However, all users of College systems, i.e. staff, students, contractors and visitors to the College, and link organisations, such as the Wildlife Park, are expected to comply with data protection legislation and support the College's Data Protection Officer, Legal and Compliance Adviser and Head of IT in meeting the College's obligations under data protection legislation, and cooperate with them in the event of a Data Breach or Cyber Security incident.
- 10.5 Any person who considers that any of the College's data protection policies and or procedures have not been followed should raise the matter with the College's Data Protection Officer by contacting judith.clapham@askham-bryan.ac.uk or by emailing DataProtection@askham-bryan.ac.uk or by contacting the Legal and Compliance Adviser at jethro.powell@askham-bryan.ac.uk.
- 10.6 If an individual makes a complaint to the College's Data Protection Officer and is not satisfied with the College's response, they may then wish contact the Information Commissioner's Office (or "ICO"), the UK's supervisory authority, at https://ico.org.uk/concerns/ and make a formal complaint.
- 10.7 The College is registered with the Information Commissioner's Office ("ICO"). The Registration Number is Z6170811. Renewal of the registration takes place annually on 22 January.
- 10.8 Please note that the ICO is unlikely to investigate a complaint without an individual first having made a complaint to the College and exhausting the College's own internal complaints procedure first, before referring the matter to the ICO.

11. RESPONSIBILITIES

11.1 The Deputy Chief Executive Officer will have overall responsibility for ensuring compliance with this Policy, assisted, where necessary by the Legal and Compliance Adviser.

11.2 All staff, however, in particular Information Systems Owners, must be aware of the retention period(s) that apply to the data they are processing/storing, and ensure that any data they process/store is deleted/destroyed/pseudonymised in accordance with the retention periods as set out in this policy.

12. MONITORING AND REVIEW

12.1 The Deputy Chief Executive Officer will maintain oversight of the effectiveness of these arrangements. This policy and the implementation arrangements which underpin it will be reviewed annually by the Deputy Chief Executive Officer and Legal and Compliance Adviser.

13. RELATED POLICIES AND PROCEDURES

This policy is supplemented by the following policies and procedures:

Data Protection Policy

Subject Access Request Policy

Subject Access Request Procedure (internal use only)

Data Sharing Policy

Data Sharing Procedure (internal use only)

Data Retention Procedure (internal use only)

Breach Detection and Reporting Policy

Breach Detection and Reporting Procedure (internal use only)

Data Subject Rights Policy

Data Subject Rights Procedure (internal use only)

14. SUPPORTING DOCUMENTS

Staff Privacy Notice
Student Privacy Notice
Student Recruitment and Marketing Privacy Notice
Privacy Notice for Parents Carers and Guardians
Visitors Privacy Notice

APPENDIX A: RETENTION SCHEDULE

Unless advised otherwise or "legal hold" applies, the following types of documents (including emails) should be kept for the period referred to below.

If more than one retention period applies, it is the longest retention period that applies. For items not on the list, assume the retention period is six years from date of completion plus one year to allow time for the data and or the physical file to be deleted/destroyed.

Please note: if any Personal Data has been shared with a third party organisation, they should also be contacted and asked to delete/destroy that data as well and provide confirmation to the College that they have done so

Please note: this list is not exhaustive.

| Apprenticeships | | | |
|-------------------------|--------------------------|---|--|
| Activity | Document Type | Retention Period | Reason for retention |
| Admission and Enrolment | ALS Questionnaire | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Applications | 10 years from completion + 1 year for successful applications or six months from the date of the application + 1 year for unsuccessful applications | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Apprenticeship Agreement | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

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| Admission and Enrolment | Apprenticeships Training Services Agreements | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
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| Admission and Enrolment | Break in learning Agreement | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Declaration of Destination | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Employer Health and Safety and welfare check | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Progress Review | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Admission and Enrolment | Record of Pre-Entry Guidance | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
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| Admission and Enrolment | Risk Assessment – Criminal Convictions/Medical | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Training Plan | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Workplace Induction Checklist | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Administration and Support | Employer Responsive (APPS) Records | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Administration and | Any other documentation | 10 years from | Legal obligation, |
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| Support | relating to apprenticeships | completion + 1 year | performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Assessment | E-Portfolio | Apprentice work will be archived once the EPO has successfully been completed and kept on the e-portfolio/e-logbook system for a minimum of 3 years unless otherwise indicated by the EPAO | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) |
| Funding | Apprenticeship Funding Data | Where Apprentice data is used as match on the 2014-20 ESF programme, the data must be retained securely until 31st December 2034 | Legal obligation, performance of a contract |
| Progression and Development | Completion Certificate | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Withdrawal | Declaration of Destination form | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| CCTV | | | |
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| Activity | Document Type | Retention Period | Reason for retention |
| Data Protection Compliance | CCTV footage | Up to 30 days unless the server is full, then that data could be overwritten, unless otherwise required for disciplinary, insurance or legal purposes, or there is some other valid justification for retaining the images/ footage for longer | Legal obligation including safeguarding of students and College's legitimate interests |
| Data Protection Compliance | ANPR data | Up to 30 days, unless otherwise required for disciplinary, insurance or legal purposes, or there is some other valid justification for retaining the images/ footage for longer | Legal obligation including safeguarding of students and College's legitimate interests |
| Data Protection | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Data Protection Compliance | (Anonymised) management statistics, analyses and reports of requests for information held by the College | Current year + 10 years | Required by Data Protection Act 2018 and GDPR |
| Data Protection Compliance | Data Privacy Impact Assessments | 2 years from date of assessment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Data Protection Compliance | Data Sharing Agreements and completed Data Protection Questionnaires | Six years from date of Data Sharing Agreement + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
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| Data Protection Compliance | Master copies of policies and procedures relating to Data Protection | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Data Protection Compliance | Privacy Notices | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Data Protection Compliance | Records documenting the handling of requests for access to personal information (Subject Access Requests, etc) | Six years + 1 year | Legal obligation and College's legitimate interests |
| Emails | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Electronic Mail Management | Emails relating to any of the categories or types of document listed in this Schedule | As per the retention period for the type of document to which they relate, e.g. Health and Safety Accident Reporting (Smartlog) - 3 years from the date of the accident + 1 year | As per the retention period for the type of document to which they relate e.g. Health and Safety Accident Reporting (Smartlog) - legal obligation and in the College's legitimate interests |

| Electronic Mail | Any emails that relate to | Relating to Students | Legal obligation, |
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| Management | Safeguarding | Until the child reaches | performance of a contract, performance |
| | | the age of 25 years | of a task in the public interest (provision of |
| | | Relating to staff | education) and College's legitimate |
| | | 10 years from the date of the allegation + 1 year | interests including safeguarding of students |
| Electronic Mail Management | Any other emails (general correspondence with colleagues and external organisations, anything not business related, Staff Notices, etc), i.e. anything else | Delete when no longer required | n/a |
| Electronic Mail Management | Spam | Not retained | n/a |
| Equality, Diversity | and Inclusion | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Equality Act Compliance | Equality and Diversity Assessments | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Finance | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Financial management | Debtor's records | Six years from end of the financial year + 1 | College's legitimate interests |

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year

| Financial management | All documents necessary to verify ESF Co-financed provision | To be retained in line with contractual requirements (at least 10 years after final ESF claim is paid by the ESF Managing Authority). For the 2014-20 ESF Programme until at least 31 December 2034. | Legal obligation, performance of a contract, and performance of a task in the public interest (provision of education) |
|--|--|--|---|
| Financial management | Financial files | Seven years from the end of the financial year + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and in the College's legitimate interests |
| Financial management | Master copies of policies and procedures relating to tuition fees, academic refunds, student payments and collections and College financial policies and procedures, etc | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Financial Management | VAT records | Six years from finance year end + 1 year | Legal obligation |
| Tuition Fees Administration Policy Development | Records documenting the development and establishment of the institution's tuition fees policies and procedures: key records | Superseded + 10 years | College's legitimate interests and performance of a task in the public interest (provision of education) |
| Tuition Fees Administration Policy Development | Records documenting the development and establishment of the institution's tuition fees policies and procedures: working papers | Superseded + 10 years | College's legitimate interests and performance of a task in the public interest (provision of education) |

| Tuition Fee Collection | Records documenting the collection of tuition fees | Current academic year + 6 years | College's legitimate interests and performance of a task in the public interest (provision of education) |
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| Freedom of Informa | ntion | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Freedom of Information Compliance | (Anonymised) management statistics, analyses and reports of requests for information held by the College | Current year + 10 years | Required by Freedom of Information Act 2000 |
| Freedom of Information Compliance | Records documenting the handling of requests for information held by the College | Completion of request handling process + 3 years | Required by Freedom of Information Act 2000 |
| Freedom of Information Compliance | Records documenting the handling of requests for environmental information held by the College | Completion of request handling process + 3 years | Required by Environmental Information Regulations 2004 |
| Freedom of Information Compliance | Records relating to the development and maintenance of the College's Publication Scheme | Completion of revision of Publication Scheme + 5 years | Required by Freedom of Information Act 2000 |
| Governance | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Administration | Corporation Minutes and Agendas and Supporting Papers | Permanent | College's legitimate interests and performance of a task in the public interest (provision of education) |

| Administration | Governance and Management Structures | Permanent | College's legitimate interests and performance of a task in the public interest (provision of education) |
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| Administration | Planning and Implementing Organisational Change | Permanent | College's legitimate interests and performance of a task in the public interest (provision of education) |
| Administration | Public Complaints | Six years from the date of record creation + 1 year | College's legitimate interests and performance of a task in the public interest (provision of education) |
| Administration | Records documenting the institution's general communications with other institutions, other educational institutions, professional associations and bodies | Six years from the date of record creation + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Compliance | Inspection Reports and Reports/Returns made to standards bodies, professional bodies, other government departments | Permanent | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Corporate Management | Strategic/Annual Plans | Permanent | College's legitimate interests and performance of a task in the public interest (provision of education) |

| Health and Safety | | | |
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| Activity | Document Type | Retention Period | Reason for retention |
| Health and Safety Audits and Inspections | Records documenting the conduct and results of Health and Safety internal audits and inspections | Superseded + 1 year | Legal obligation and in the College's legitimate interests |
| Health and Safety Consultation | Records documenting the formation of a safety committee to fulfil the College's duty under section 2(7) Health and Safety at Work Act 1974 and Regulation 9 of the Safety Representatives and Safety Committees Regulations 1977. Includes records documenting the objectives, role, functions, composition and administration of the committee | Life of committee + 50 years | Legal obligation and in the College's legitimate interests Required by the Safety Representatives and Safety Committees Regulations 1977 |
| Health and Safety Consultation | Notifications of appointments of safety representatives by trade unions under Regulation 3 of the Safety Representatives and Safety Committees Regulations 1977 | Termination of appointment + 1 year | Legal obligation and in the College's legitimate interests. Required by the Safety Representatives and Safety Committees Regulations 1977 |
| Health and Safety Incident Recording, Reporting and Investigation | Accident Reporting (Smartlog) | 3 years from the date of the accident + 1 year | Legal obligation and in the College's legitimate interests |
| Health and Safety Incident Recording, Reporting and Investigation | Records documenting the notification and reporting (to the relevant enforcing authorities) of reportable accidents, dangerous occurrences and outbreaks of notifiable diseases to enforcing authorities | Date of notification + 3 years | Required by Regulation 7(3) of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (SI 2013/1471) |

| Health and Safety Incident Recording, Reporting and Investigation | Any correspondence with the Health and Safety Executive and or successor body, as part of a health and safety investigation, etc. | 5 years + 1 year | Legal obligation and in the College's legitimate interests |
|---|---|--|--|
| Health and Safety - Policies | Records documenting the development and establishment of the institution's health and safety management policies and procedures | Superseded + 3 years | Legal obligation and in the College's legitimate interests |
| Management of Health and Safety- Risk Assessment Reports | Health and Safety Risk Assessment Reports | Academic year + 1 year Unless accident in which case 3 years + 1 year as saved to Smartlog | Legal obligation and in the College's legitimate interests |
| Management of Health and Safety - Asbestos Control | Asbestos Register | Last entry + 40 years | Legal obligation and in the College's legitimate interests |
| Management of Health and Safety – COSHH | MSDS factsheets | 5 years + 1 year | Legal obligation and in the College's legitimate interests |
| Management of Health and Safety - DSE Regulations 1992 | DSE assessments | 5 years from date of assessment + 1 year | Legal obligation and in the College's legitimate interests |
| Management of Health and Safety – Electrical Safety | PAT Testing | Records of all testing and inspection must be kept for the life of the appliance and for five years thereafter | Required by Electricity at Work Regulations 1989 and the Provision and Use of Work Equipment Regulations 1998 |
| Management of Health and Safety – Fire Safety | Records documenting the conduct, review and revision of fire safety risk assessments | Superseded + 5 years | Required by Article 9 of the Regulatory Reform (Fire Safety) Order 2005 (SI 2005/1541) |

| Management of Health and Safety – Fire Safety | Records documenting the provision of fire safety training to employees to fulfil the institution's duties under Article 21 of the Regulatory Reform (Fire Safety) Order 2005 (SI 2005/1541) | 7 years from date of leaving + 1 year | Required by Article 21 of the Regulatory Reform (Fire Safety) Order 2005 (SI 2005/1541) |
|---|---|---------------------------------------|--|
| Management of Health and Safety – First Aid | Records documenting the provision of approved training for first aiders to fulfil the institution's duties under Regulation 3 of the Health and Safety (First Aid) Regulations 1981 (SI 1981/917) | 7 years from date of leaving + 1 year | Required by Regulation 3 of the Health and Safety (First Aid) Regulations 1981 (SI 1981/917) |
| Management of Health and Safety – First Aid | RLSS qualifications and awards | 7 years from date of issue + 1 year | As per RLSS Approved Training Centre/ Provider Guidance Manual |

Higher Education

| Activity | Document Type | Retention Period | Reason for retention |
|---|--|--|---|
| HE Academic Services (HE Learning Support) | Correspondence with Student Finance England (DSA) | Six years from date of enrolment + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract |
| HE Academic Services (HE Learning Support) | Diagnostic Assessments | Six years from date of enrolment + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract |
| HE Academic Services (HE Learning Support) | Medical evidence e.g. record of support (recorded on ProMonitor) | Six years from date of enrolment + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract |

| HE Academic Services (HE Learning Support) | Needs Assessment Reports | Six years from date of enrolment + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract |
|---|---|--|--|
| HE Academic Services (HE Learning Support) | Any other records | Six years from date of enrolment + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract |
| HE Academic Services (HE Learning Support) | Master copies of the College's learning support policies and procedures | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Administration | Public Complaints | Six years from the date of record creation + 1 year | College's legitimate interests and performance of a task in the public interest (provision of education) |
| Admission and Enrolment | Application forms | 2 months + 1 year for unsuccessful applicants; 10 years + 1 year for successful ones | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Enrolment forms and Learner Agreements | Six years from date of enrolment + 1 year; six months from the date of the application for unsuccessful application | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Admission and Enrolment | Postponement request | Six years from date of postponement + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
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| Admission and Enrolment | Records documenting academic progress including action taken to deal with unsatisfactory progress, the transfer of students to new programmes or to new courses within programmes | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Assessment and Examinations | UCAB Awards | Permanent | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) |
| Assessment and Examinations | Written work or any written elements of assessment | 5 years after the end date of the course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) |
| Assessment and Examinations | Practical work – e.g. laboratory/ husbandry/ animal handling | 5 years after the end date of the course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) |
| Assessment and Examinations | Physical artefacts | 5 years after the end date of the course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) |

| Assessment and Examinations | Digital media | 5 years after the end date of the course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) |
|------------------------------|--|---|--|
| Assessment and Examinations | Any type of work that is assessed through observation | 5 years after the end date of the course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) |
| Assessment and Examinations | Placement | 5 years after the end date of the course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) |
| Funding | HEFCE Funding (HEFCE) Records | 10 years from completion + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Funding | FSD Non-ESF ABU EIRE Fund for Students with Disabilities including routing emails and other correspondence, allocation, operational documents, etc | Anonymised + retained for statistical purposes | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Graduate Outcomes Surveys | Responses to survey questions | See HESA Privacy Notice available at Collection notices HESA | Legal obligation |

| Partnership Agreements | Partnership Agreements and arrangements for archive: For Higher Educational validation partnerships, archive arrangements should be consistent with the awarding institutional guidelines | See HEI Guidelines and or partnership agreement | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
|-----------------------------|--|---|---|
| Policies | Master copies of policies and procedures relating to UCAB and HE provision | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Progression and Development | Mitigating Circumstances Applications and related correspondence and supporting evidence | Last action + 6 years | College's legitimate interests |
| Progression and Development | Records relating to academic appeals | Last action + 6 years | College's legitimate interests |
| Quality | Documents relating to academic misconduct or allegations of academic misconduct | Last action + 6 years | College's legitimate interests |
| Quality | Validation documentation | Six years from submission + 1 year | College's legitimate interests |
| Student Records | ProMonitor | Completion of course + 1 year | Legal obligation, performance of a contract, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Student Surveys | Summaries and analyses of responses | Completion of survey + 5 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
|-----------------------|--|---|---|
| Inclusive Services (L | earning Support) | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Inclusive Services | EHCPs, draft/proposed EHCPs, EHCP reviews, documents relating to an EHCP such as copy reports, and correspondence with local authorities, etc | 31 years from date of birth + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract |
| Inclusive Services | Individual Education Plans including Support Plans | Six years from date of enrolment + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract |
| Inclusive Services | Health Care Plans | Six years from date of enrolment + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract |
| Inclusive Services | Risk Assessments | Six years from date of enrolment + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract |

| Inclusive Services Inclusive Services | Any other records including exam access arrangements Master copies of the College's learning support policies and procedures | Six years from date of enrolment + 1 year Superseded + 3 years | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
|---------------------------------------|--|---|--|
| Insurance | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Compliance | Records documenting claims made under insurance policies | Six years from settlement of claim + 1 year OR Six years from withdrawal of claim + 1 year | Legal Obligation and College's legitimate interests |
| Legal | | | |
| Document Type | Document Type | Document Type | Document Type |
| Claims Management | Records documenting the provision of legal support and representation for the institution in dealing with claims by or against the institution which do not proceed to litigation or settlement by an agreement | Six years from the settlement of claim + 1 year OR Six years from withdrawal of claim + 1 year | College's legitimate interests |
| Contracts management | Agreements, leases, licences, deeds and contracts under seal and any relevant correspondence and or documents relating to formation of that agreement/contract/deed | 12 years from termination of contract + 1 year | Performance of a contract and College's legitimate interests |

| Contracts | Other contracts and | Six years from | Performance of a |
|-------------------------|--|--|---|
| management | agreements and any relevant correspondence and or documents relating to formation of that agreement/contract | termination of contract + 1 year | contract and College's legitimate interests |
| Contracts Management | YNYCA ASF - invoices, receipts, accounts and any other relevant documents relating to the expenditure of the Grant | Seven years following receipt of any Grant monies to which they relate + 1 year | Performance of a contract |
| Governance | Records documenting the development and establishment of the institution's policies on legal affairs and the acquisition/provision of legal services | Superseded + 5 years | Legal obligation and College's legitimate interests |
| Legal Advice | Records documenting legal advice requested by, and provided to, the institution concerning: - interpretation of legislation affecting the institution's legal framework, governance, responsibilities or operations; - proposals for new legislation affecting the institution's legal framework, governance responsibilities or operations; - the institution's relationships with government bodies and HE regulators; - industrial relations issues; - health, safety and environmental issues | Permanent | College's legitimate interests |

| Activity | Document Type | Retention Period | Reason for retention |
|--|---|---|--|
| Alumni Data | Alumni communications | Issue + 1 year | Consent and College's legitimate interests |
| Alumni Data | Records containing personal data on individual alumni | For as long as the individual remains an alumnus + 1 year | Consent and College's legitimate interests |
| Enquiries | Enquiries from members of the public, prospective students, etc and responses provided | 2 years + 1 year | College's legitimate interests |
| Marketing – campaigns and promoting the College | Consent to audio/video recording/capture of images | 3 years from date of marketing event + 1 year | Consent, College's legitimate interests |
| Marketing – campaigns and promoting the College | "Keep warm" campaigns | 2 months from date of campaign communication + 1 year | Consent, College's legitimate interests |
| Marketing – campaigns and promoting the College | Open days/Open events | 3 years from date of Open Day/Open Event + 1 year | Consent, College's legitimate interests |
| Marketing – campaigns and promoting the College | Photographs, audio recordings, and video recordings of marketing events | 5 years from date added to media library + 1 year | Consent, College's legitimate interests |
| Marketing – campaigns and promoting the College | Taster days and Applicant Sessions | 3 years from date of Taster Day/Applicant Session + 1 year | Consent, College's legitimate interests |
| Marketing – campaigns and promoting the College | Emails relating to any of the above categories or types of document | As per the retention period for the type of document to which they relate. Otherwise, deleted when no longer required | Consent, College's legitimate interests |

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| Marketing – campaigns and promoting the College | Press Releases | 10 years + 1 year | College's legitimate interests |
|--|--|---|---|
| Marketing Strategy | Records documenting the development of the College's Marketing Strategy: key records | Superseded + 5 years | College's legitimate interests |
| Marketing Strategy | Records documenting the development of the College's Marketing Strategy: working papers | Issue of Strategy + 1 year | College's legitimate interests |
| Stakeholder Engagement | Records documenting the development of the College's Stakeholder Engagement Strategy: key records | Superseded + 5 years | College's legitimate interests |
| Stakeholder Engagement | Records documenting the development of the College's Stakeholder Engagement Strategy: working papers | Issue of Strategy + 1 year | College's legitimate interests |
| Surveys | Online Surveys | 5 years from date of survey + 1 year | Consent, College's legitimate interests |
| Offsite Activities | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Offsite Activities | Information regarding offsite | 3 years from the date | Legal obligation, |

| Activity | Document Type | Retention Period | Reason for retention |
|--------------------|--|--|--|
| Offsite Activities | Information regarding offsite activities, trips, etc | 3 years from the date of the activity + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

Online Store

| Activity | Document Type | Retention Period | Reason for retention |
|----------|---|---|--|
| Sales | Transaction Data | For as long as an account is active. See Privacy Policy Flywire for further details | Performance of a contract |
| Sales | RCP Payment information | For as long as an account is active. See Privacy Policy Flywire for further details | Performance of a contract |
| Quality | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Quality | Audits and lesson observations, learning walks, PELPS and mentor meetings | Completion of audit/activity + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Quality | CVs, CPD and evidence of certification shared with awarding organisations | Within 1 year of staff member leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Quality | Records documenting the development of the College's internal quality assurance processes | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |

| Safeguarding | | | | |
|--------------|--------------------------------|---|---|--|
| Activity | Document Type | Retention Period | Reason for retention | |
| Safeguarding | Safeguarding (staff records) | Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse. All records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract and College's legitimate interests including safeguarding of students | |
| Safeguarding | Safeguarding (student records) | All records relating to individual children must be retained for a reasonable period of time after they have left the provision. Currently it is recommended that Safeguarding/Child Protection records be retained until the child reaches the age of 25 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students | |
| Safeguarding | Smoothwall and Senso | 1 year + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract and College's legitimate interests including safeguarding of students | |

| Safeguarding | Information provided on Whisper form | 3 years + 1 year | Legal obligation, performance of a task in the public interest (provision of education) and performance of a contract and College's legitimate interests including safeguarding of students |
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| | | | |

Staff Records

| Activity | Document Type | Retention Period | Reason for retention |
|------------------------|---|---------------------------------------|---|
| Contract Management | Absence – records documenting employee's absence due to sickness, etc | 7 years from date of leaving + 1 year | Required by the Statutory Sick Pay (Maintenance of Records) (Revocation) Regulations 2014 (SI 2014/55) |
| Contract Management | Absence – records documenting the authorisation of special leave e.g. compassionate leave, maternity leave and paternity leave, etc | 7 years from date of leaving + 1 year | Required by the Maternity and Parental Leave etc Regulations 1999 (SI 1999/3312) |
| Contract Management | Appraisals – records of appraisals, reviews of employee's performance etc | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Contract Management | Details of any settlements, employment tribunal claims, etc. | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|------------------------|--|--|--|
| Contract Management | Job Descriptions | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Contract Management | Leaver Information – resignation, forms, etc. | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Contract Management | Part-time variable contract | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Contract Management | P45 | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Contract Management | Redundancy information | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|-----------------------------|--|---|--|
| Contract Management | Staff Contract including any changes to Staff Contract and details of salary and holiday entitlement | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Contract Management | TUPE | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Induction | Records documenting the development, overall delivery and assessment of induction programmes for new employees | Current year + 6 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Learning and Development | E-learning certificates | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Learning and Development | Staff Development – short courses | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|-----------------------------|---|--|--|
| Learning and Development | Staff Development – long courses | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Occupational Health | Occupational Health referrals, reports, etc. | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Occupational Health | Occupational Health records including Health Surveillance records | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Payroll | Payroll records | 7 years from payroll date + 1 year | Legal obligation, performance of a contract and in the College's legitimate interests |

| Payroll | Statutory Maternity Pay, etc – records relating to the entitlement to and calculation of | 7 years from date of leaving + 1 year | Required by the Statutory Maternity Pay (General) Regulations (SI 1986/1960) (Regulation 26) |
|------------------------------|--|--|---|
| Payroll | Statutory Sick Pay, etc – records relating to the entitlement to and calculation of | 7 years from date of leaving + 1 year | Required by the Statutory Sick Pay (Maintenance of Records) (Revocation) Regulations 2014 (SI 2014/55) |
| Pension | Pension scheme records | Permanent | Legal obligation and in the College's legitimate interests |
| Pension | Retirement benefits | A minimum of six years from the end of the year in which the accounts were signed + 1 year | Regulation 15 of the Retirement Benefits Schemes (Information Powers) Regulations 1995 |
| Policies | Records documenting the development and establishment of the institution's People Services policies and procedures | Superseded + 3 years | Legal obligation and in the College's legitimate interests |
| Recruitment and Selection | Application form | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | Bank details | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Recruitment and Selection | Criminal Convictions Declaration (if completed) | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|---------------------------|---|---|--|
| Recruitment and Selection | CV - successful | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | CV - unsuccessful | Six months after interview + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | Copies of DBS certificates | 6 months from date of recruitment + 1year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | Health Declarations | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Recruitment and Selection | Interview notes – successful | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|---------------------------|-----------------------------------|---------------------------------------|--|
| Recruitment and Selection | Interview notes – unsuccessful | Six months after interview + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | New Starter form | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | Offer letter | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | Proof of qualifications obtained | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Recruitment and Selection | References | 7 years from date of leaving + 1 year References for unsuccessful candidates – completion of recruitment process + | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including |
|---------------------------|---|---|--|
| Recruitment and Selection | Right to work, etc | 1 year 7 years from date of leaving + 1 year | safeguarding of students Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | Shortlisting information | Six months from the selection decision + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | Starter data such as copied ID, driving licence, etc. | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Recruitment and Selection | Staff Risk Assessment | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Staff Managamant | Appraisal | Six years from data of | Logal obligation |
|------------------------------------|---|--|---|
| Staff Management | Appraisal | Six years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Staff Management | Request to bring an | Six years from date of | Legal obligation, |
| | Assistance Dog on site and any supporting documentation | request + 1 year | performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of |
| 04 66 14 | <u> </u> | 7 | students |
| Staff Management Staff Management | See also Safeguarding Grievance See also Safeguarding | 7 years from date of leaving + 1 year 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students Legal obligation, performance of a contract, performance of a task in the public |
| Staff Management | Personnel files | 7 years from date of | interest (provision of education) and College's legitimate interests including safeguarding of students Legal obligation, |
| July management | T Gradinior lifes | leaving + 1 year | performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Staff Management | Probationary Review | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|---------------------------------------|--|---|--|
| Staff Management | Maternity/Paternity/Adoption and flexible working/compassionate leave, etc. | 3 years after the end of the tax year in which the maternity period ends | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Staff Management | Sickness/sick notes/any other documents relating to return to work after sickness | 7 years from date of leaving + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Strategy and Policy Development | Records documenting the development and establishment of the College's People Strategy: key records | Superseded + 10 years | College's legitimate interests |
| Strategy and Policy Development | Records documenting the development and establishment of the College's People Strategy: working papers | Issue of document + 1years | College's legitimate interests |
| Surveys | Identifiable individual responses to workforce surveys and consultation | Completion of analysis of responses + 1 year | College's legitimate interests |

| Surveys | Summary (anonymised) of results of workforce surveys and consultation | Completion of survey + 5 years | College's legitimate interests |
|---|---|---|--|
| Student Accommoda | ation | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Student Accommodation | Accommodation (including Apprenticeships accommodation, Duty Student accommodation, ad hoc bookings, etc) | Successful applications 7 years from date of the application + 1 year 2 years for unsuccessful applications + 1 year | Performance of a contract, and College's legitimate interests including trend analysis |
| Student Counselling | Services | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Student Counselling Services | Case notes, letters to doctors, etc | As per professional guidelines | Legal obligation |
| Student Behaviour (| Support for Continuing Studies |) | |
| Activity | Document Type | Retention Period | Reason for retention |
| Student Behaviour (Support for Continuing Studies) | Student Disciplinary leading to removal from College See also Safeguarding | Exclusions will remain on file for a period of 3 years + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Student Behaviour (Support for Continuing Studies) | Student Behaviour leading to other sanctions See also Safeguarding | Stages 1- 3 - to be wiped by the end of the academic year to which it relates + 1 year Stage 4 - within 2 subsequent academic years + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|---|--|---|--|
| Student Financial S | upport | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Student Financial Support | Bursary Information | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Student Financial Support | Master copies of the College's student financial support policies and procedures | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Student Records | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Admission and Enrolment | Enrolment forms and Learner Agreements | 16- 19: Six years from date of enrolment + 1 year; six months from the date of the application for unsuccessful | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and |

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application

Adults: as per ESF

contract guidance

College's legitimate interests including

safeguarding of

students

| Administration | Individual Student Records (European Social Fund) | Six years from the date of record creation + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|-----------------------------|--|--|--|
| Assessment and Examinations | Awarding Body Records | As per awarding body's retention period | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Assessment and Examinations | Awarding body certificates | Awarding body certificates are not retained. Originals are issued to students. Any returned will be returned to the relevant awarding body | n/a |
| Assessment and Examinations | BTec/EdEXCEL | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Assessment and Examinations | City & Guilds Awarding Body Records | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Assessment and Examinations | Gateway Qualifications | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |

| Assessment and Examinations | IMI | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
|-----------------------------|--------------|--|--|
| Assessment and Examinations | NCFE | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Assessment and Examinations | King's Trust | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests See also Privacy Notice Terms and conditions The King's Trust |
| Assessment and Examinations | RHS | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Assessment and Examinations | SEG Awards | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |

| Assessment and Examinations | VetSkill | Six years from the date of learner certification + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
|-----------------------------|--|---|--|
| Assessment and Examinations | Vtct | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Assessment and Examinations | 'Live' Portfolios (paper and electronic)* *these are the Portfolios that relate to current learning and certificates haven't been claimed | 2 years from end of course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Assistance Dogs | Request to bring an Assistance Dog on site and any supporting documentation | Six years from date of request + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Funding | All records above which relate to ESF programmes (match or directly ESF funded) | To be retained in line with contractual requirements (at least 10 years after final ESF claim is paid by the ESF Managing Authority) For the 2007-13 ESF Programme the retention period has now been reached and all relevant documentation can be destroyed. For the 2014-20 ESF Programme until at least 31 December 2034. | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |

| Funding | Learner Responsive (FE) Records | Six years from Financial Year End after last payment made + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
|---|---|---|---|
| Student Records | ProMonitor | Completion of course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Tuition Fee Remission: Successful Applications | Records documenting the handling of applications for remission of tuition fees: successful applications | Determination of application + 6 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Tuition Fee Remission: Unsuccessful Applications | Records documenting the handling of applications for remission of tuition fees: unsuccessful applications | Determination of application + 6 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Withdrawal | Withdrawal forms | Six years from completion of course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Student Recruitment | | | |
|-------------------------|--|--|--|
| Activity | Document Type | Retention Period | Reason for retention |
| Admission and Enrolment | Admissions Panel | Six years from completion of course+ 1 year; six months from the date of the application for unsuccessful applications + 1 year (unless Safeguarding concerns) | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Application forms | 2 months + 1 year for unsuccessful applicants; Six years + 1 year for successful ones | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | Records documenting the development and establishment of the College's admissions criteria and policies and procedures | Superseded + 10 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Admission and Enrolment | References for students | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Admission and Enrolment | Risk Assessment (criminal convictions/medical) | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|-------------------------|--|---|--|
| Admission and Enrolment | Student Interview Files | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

Student Services

| Activity | Document Type | Retention Period | Reason for retention |
|--|---|---|--|
| Policies | Master copies of policies and procedures relating to Student Services | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Student Administration and Support | Care Plan | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

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| Student Administration and Support | Doctor's Surgery Questionnaire | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Student Administration and Support | Signed medical consent forms | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Student Administration and Support | Student Support – Duty Logs | 1 year from date of log + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Student Administration and Support | Student Support - Other | Six years from date of enrolment + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
| Student Progression and Development | Careers advice | Six years from completion of course + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |

| Student Progression and Development | Student work experience | Six years from completion of work experience + 1 year | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students |
|---|--|---|--|
| Student Surveys | Summaries and analyses of responses | Completion of survey + 5 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Teaching, Learning | and Assessment | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Policies | Master copies of policies and procedures relating to Teaching, Learning and Assessment | Superseded + 3 years | Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Teams | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Use of Teams Channels | Content, Profile Data, Call History, Call Quality Data, Support/Feedback Data and Diagnostic and Service Data | Until the user stops using Microsoft Teams, or until the user deletes Personal Data. If a user (or an administrator on the user's behalf) deletes their data, Microsoft will ensure that all copies of the personal data are deleted within 30 days. For further details see Microsoft Teams Privacy - Microsoft Teams Microsoft Learn | Performance of a contract – to deliver the service |

| Transport | | | |
|---------------------------------------|--|---|---|
| Activity | Document Type | Retention Period | Reason for retention |
| Transport management (Staff) | Details of driver's licences, insurance and MOT certificates to use College fleet vehicles/claim travel expenses | Duration of employment with the College + 1 year | Legitimate interests |
| Transport management (Staff) | Applications to drive College or farm vehicles/own car for work purposes | 1 year from end of academic year + 1 year Six months from the date of the application for unsuccessful applications + 1 year | Performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Transport management (Staff) | Car park permit form | Six months from date of leaving + 1 year | Performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Transport management (Staff) | MIDAS Certificates, MIDAS requests and copy drivers' licences | Six months from date of leaving + 1 year | Performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |
| Transport management (Students) | Details of students requiring transport | 1 year from end of academic year + 1 year. Six months from the date of the application for unsuccessful applications + 1 year See also the ShuttleID Privacy Policy available at https://shuttleid.uk/ | Performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests |

^{*}Always Learning* *Building Trust* *Taking Ownership* *Delivering with Purpose* *Sustainability*

| Transport management (Students) | Student Car Parking form | 3 years from the date of enrolment + 1 year | Safeguarding of students, performance of a task in the public interest (provision of education) |
|---------------------------------------|---|--|---|
| UKVI | | | 1 |
| Activity | Document Type | Retention Period | Reason for retention |
| UKVI | Documents relating to sponsorship etc | Duration of sponsorship + 1 year | Legal obligation |
| Visitors | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Visitor Information | Personal Details – name, surname, etc | 1 year from date of visit + 1 year | Safeguarding of students, performance of a task in the public interest (provision of education) |
| Voicemail | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Voicemail Information | Personal Details – name, surname, contact number, etc | All voicemail recordings will be automatically deleted after 14 days unless they are saved | Consent, Legitimate interests |
| Wildlife Park | | | |
| Activity | Document Type | Retention Period | Reason for retention |
| Sales – Tickets to the Wildlife Park | Transaction Data | 5 years from date of transaction + 1 year | Performance of a contract |
| | | | |

Back Ups

The College adopts the grandfather father son backup method. All College hosted systems are backed up nightly to multiple locations including offsite in accordance with the below schedule, following GFS principles:

Every 1 day for 30 days. Every 1 month on last day of the month for 12 months. Every 1 year on last day of the year starting in January for six years.

However, the same retention periods referred to above will apply.