

Data Retention Policy

Introduction and Legislative Context

This Policy, together with the School's [Detailed Data Retention Schedule](#), sets out the time periods for which records should be retained by the School in order to meet its duty of care to its students, staff and applicants, to comply with its legal and regulatory requirements, including the [General Data Protection Regulation](#) and [Data Protection Act 2018](#), the [Limitation Act 1980](#), [UK Home Office](#), and to comply with operational requirements. The Schedule has been drawn up in line with the [JISC guidance on record retention for higher education providers](#), as well as legal and regulatory requirements.

Definitions

A record is defined in the Records Management British Standard BS ISO 15489 as “Information created, received and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business”.

Scope

All records created and held by the School, both in paper and electronic form, and including data held in databases are subject to this data retention policy.

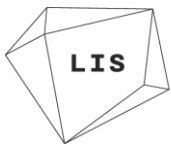
Schedule

The default action to be taken at the end of the retention period is the secure destruction or deletion of the record, except where the retention period is defined as permanent or where the record may be considered for retention for archival value.

Only one copy of each record needs to be kept for the full length of the retention period, unless there are operational reasons for the record being held in more than one School department. Duplicate and secondary copies should be destroyed as soon as they are no longer of immediate operational use, and in any case should be destroyed at the end of their retention period.

At the end of the specified retention period, departments are required to log what has happened to the document (i.e., destroyed or retained for archival value), and at what date this occurred.

The School's Summary Data Retention Schedule below provides generic guidance on the retention of common records generated by the School in the course of its normal work. It should be viewed as a guide in determining the retention period for particular document types. The retention periods are generally derived from [JISC best practice](#), the provisions of the [Limitation Act 1980](#) and other regulation relating to Data Protection and statutory benefits.



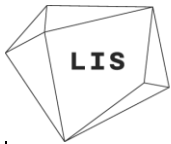
Employees should refer to the School's [Detailed Data Retention Schedule](#) for a detailed breakdown of records by function, activity and record group. Staff may also refer to the [JISC guidance on records management](#).

The School will record and retain all personal data in compliance with data protection regulation and the School's [Data Protection Policy](#) to ensure confidentiality.

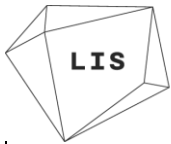
The table below summarises the key highlights of the School's [Detailed Data Retention Schedule](#). Staff should refer directly to the [Detailed Data Retention Schedule](#) where the document type is not covered in this table, or where the retention period is unclear.

Summary Data Retention Schedule

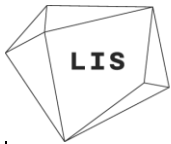
Document type	Description	Retention period	Rationale
Students			
Core student data held in student records system	Personal identifiers and final award details (including confirmed module result data and transcript, and any disciplinary action leading to expulsion)	Permanent	To supply transcripts; JISC recommendation
Records documenting assessment and non-assessment related advice given to students; and decisions made about a student, including documents that support the decision-making.	Records documenting the conduct and results of: <ul style="list-style-type: none"> • Course and Module / Award Boards of Examiners • Disciplinary hearings • Academic appeals / student complaints • Fitness to practise • Notes from 'advisory' meetings with academic tutors • Academic misconduct hearings • Assessment feedback documents (not the assessment itself) • Admissions documentation 	6 years following last action on case, or formal confirmation of outcome by appropriate body or completion of award	Limitation Act 1980; JISC recommendation; GDPR
Student assessments	Work submitted by students for assessment, including assignments, examination scripts, portfolios or dissertations	End of academic year + 3 years	Sector guidance
Sponsored international students	Records in line with Appendix D of Student Sponsor guidance: copy of current passport, biometric immigration document, date of entry to UK, absences/attendance, contact details (UK residential address, mobile number)	One year after sponsorship of student has ended/ the date on which a compliance officer has examined and approved	Appendix D of Home Office sponsorship guidance



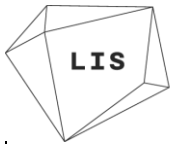
		them, if this is less than one year after sponsorship has ended	
Applicants			
Records documenting the handling of unsuccessful applications	Records including application form, supplementary candidate information,	1 year after completion of application process	JISC recommendation; GDPR
Employees			
Employment records relating to individual staff	Records including records of successful job application, contact details (UK residential address, personal email address, telephone number (mobile and/or landline), contracts of employment, and individual staff records, health records and absences due to sickness, and documents relating to redeployment, redundancy, and termination of employment.	6 years after end of employment with the School	Limitation Act 1980 UKVI Sponsor requirements (Appendix D)
Employment records relating to sponsored skilled workers	In addition to the above, and in line with Appendix D of the Home Office Sponsor guidance , evidence of right to work checks, such as a copy of current passport, biometric residence permit, leave to remain verification, job description, copies of any required DBS checks, history of contact details, salary and allowances, records of any other type of absence	One year after sponsorship of worker has ended/ the date on which a compliance officer has examined and approved them, if this is less than one year after sponsorship has ended	UKVI Sponsor requirements (Appendix D)
Records documenting successful applications for job vacancies	Records including advertisements placed, completed application forms, CVs, references, attached letters, details of shortlisted applicants, evidence of how decision for selection was made (interview notes, rubric, selection notes)	6 years after end of employment	Limitation Act 1980 UKVI Sponsor requirements (Appendix D)
Records documenting unsuccessful applications for job vacancies	Records including completed application forms, CVs, references, attached letters	1 year after completion of recruitment	Equality Act 2010, Employment Equality Regulations; UK Border Agency Sponsor Policy Guidance



Records documenting authorisation and administration of statutory leave and pay	Records relating to the entitlements to and calculation of statutory leave and pay (maternity, adoption, paternity, shared parental, and statutory sickness).	6 years	Maternity and Parental Leave Regulations 1999; Statutory Sick Pay (General) Regulations 1982
Governance and Statutory duties			
Records documenting the School's governance arrangements	Records documenting information that defines the governance arrangements of the organisation, as well as those documenting the business of governance statutory committees	Permanent	JISC recommendation
Records documenting the School's relationships and responsibilities to statutory bodies and in meeting its legal responsibilities.	Records documenting information that: <ul style="list-style-type: none"> • The institution is legally obliged to provide to the funding and statutory bodies • Underpin the institution's arrangements in meeting legislative requirements (e.g. health and safety strategies / equality and diversity policies) 	Permanent	JISC recommendation
Statutory returns	Statutory returns and data supply relating to student (including HESA returns), and relating to staff, finance and DHLE—output reports	Permanent	Historic value
Finances			
Records documenting the organisation's financial management arrangements.	Records detailing University's accounts, payroll handling, procurement, tax arrangements, investments, insurance management etc.	End of current financial year + 6 years (then review for archival value)	Limitation Act 1980
Strategy and Planning			
Records documenting the institution's strategic and corporate plans and those defining relationships with trade unions.	All corporate/ strategic level documents (both at institutional and functional level) for example: <ul style="list-style-type: none"> • Strategic Plan • Teaching and Learning Strategy • Risk and Performance Management Plans • Agreements with Trade Unions 	Superseded + 10 years (then review for archival value)	Historic value; JISC recommendation
Regulations and policies			



Records documenting the institution's regulations and policies.	Records documenting the establishment of all key policies and regulations, including those related to staff and student behaviour. For example: <ul style="list-style-type: none"> • Academic Regulations • HR Policies • Tuition Fee Policies 	Superseded + 10 years (then review for archival value)	JISC recommendation
Key operating procedures			
Records documenting the institution's procedural arrangements for its operations	Records documenting the establishment of key operating procedures. For example: <ul style="list-style-type: none"> • Procedures for the validation and review of taught programmes • Procedures for undertaking administrative tasks in managing a student's programme 	Superseded + 5 years (then review for archival value)	JISC recommendation
Monitoring and performance			
Records documenting the review, analysis, monitoring and performance of operations.	Records documenting the establishment and use of activities used to monitor the impact or measure the performance of particular activity. For example, customer satisfaction surveys, performance management reviews, and retention analysis. If the data is not anonymised, it must meet the requirements in the ICO Anonymisation Guidance in order to comply with data protection regulation.	Current Year + 5 years (then review for archival value)	
Information and Communications			
Records documenting the handling of enquiries made by those external to the institution (statutory).	Records documenting enquiries and requests from individuals/organisations. For example, FoI requests, subject access requests, and correspondence with the ICO	Last action + 3 years	
Records documenting the handling of enquiries made by individuals/ organisations external to the institution (non- statutory).	Records documenting enquiries, public complaints and requests from individuals/organisations., for example, reference requests	Last action + 1 year (then destroy)	Limitation Act 1980

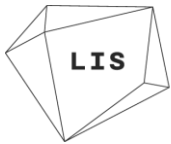


Records documenting the handling of non-statutory communications with those external to the organisation.	Records documenting general communications with those external to the organisation and the internal handling of related responses; for example, press releases and marketing campaigns	5 years	JISC recommendation
Internships			
Records documenting relationships with employers.	Records relating to relationships with employers, including contracts not signed under seal	6 years after end of relationship	Limitation Act 1980; JISC recommendation
Internship and training agreements	Records relating to the internship or training of students in external organisations	6 years after completion of internship	Limitation Act 1980
Contracts and Licenses			
Building or maintenance contracts	Contracts relating to building or maintenance work	15 years	Limitation Act 1980; Latent Damage Act 1986
Intellectual property agreements and licenses	Includes copyright licenses	12 years	Limitation Act 1980; ICSA recommendation
Estates licenses	Records relating to estates licenses, including negotiation of licenses	15 years	Limitation Act 1980; Latent Damage Act 1986; ICSA recommendation
External examiner contracts	Contractual documents relating to external examiners, for example appointment letters	6 years	Limitation Act 1980

Records that can be routinely destroyed

Records that have no significant informational, operational or evidential value, and which are not subject to legal or statutory rules in relation to their retention, can be destroyed as soon as they have served their primary purpose. This will include, but will not be limited to:

- Requests for, and confirmations of, reservations for internal services (such as meeting rooms), where no internal charges have been made;
- Transmission documents (for example, cover sheets, routing slips, compliment slips and letters which accompany documents but do not add value to them);
- Superseded address lists or distribution lists;
- Snapshot printouts or extracts from databases;
- Personal diaries and address books;
- Working papers, where the results have been written into an official document, and are not required to support it;
- Stocks of in-house publications that are obsolete, superseded, or otherwise useless, such as magazines, prospectuses, directories, forms, and other materials produced for wide distribution.



Responsibilities

The School's Registrar is the designated officer responsible for maintaining, and where necessary, expanding the master copy of the School's [Detailed Data Retention Schedule](#) and this Data Retention Policy.

All staff are required to comply with the retention schedule set out in this Policy and the School's [Detailed Data Retention Schedule](#). Where employees are unsure of the retention schedule for a record after consulting this Policy or the [Detailed Data Retention Schedule](#), they should consult the School's Registrar.

Employees must inform the Registrar of any specific timeframe that a particular record is required that sits outside the regulations set out in this Policy and in [Detailed Data Retention Schedule](#). Where appropriate, the Registrar will modify the School's Data Retention Schedule (both this Policy and the detailed schedule) accordingly. Any requests for additions or amendments to the [Detailed Data Retention Schedule](#) or this Policy should be processed through the Registrar.

Where records are scheduled to be destroyed, employees must do so carefully, through shredding or confidential waste collection.

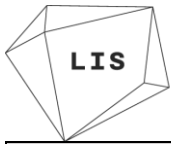
Failure to comply with this policy could result in disciplinary procedures being raised.

Monitoring and Review

The Registrar is may recommend changes to this Policy and the [Detailed Data Retention Schedule](#) in the light of organisational, regulatory or legislative changes at any time, as required, with changes authorised by the Board of Directors. This Policy and the Data Retention Schedule must be reviewed at least once every two years.

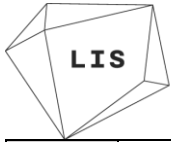
Version Control

Name of policy/procedure:	Data Retention Schedule Policy
Document owner:	Hannah Kohler, Director of Admissions and Student Support
Date Originally Created:	01/2019
Last reviewed:	07/2021
Reviewed by:	Jasper Joyce (Director of Finance and Operations)



Audited by:	Board of Directors
Date of Audit:	07/2021
Date of next review: (annually unless otherwise agreed)	07/2022
Related documents: (e.g. associated forms, underpinning processes, related policies or overarching policies)	Detailed Data Retention Schedule Data Protection Policy Skilled Worker Visa Policies and Procedures Home Office Compliance Policy

Version Control			
Version	Author	Date	Brief summary of changes
1	Hannah Kohler (Director of Admissions and Student Support)	13/01/2019	Original draft
2	Jasper Joyce (Director of Finance and Operations)	14/02/2019	Minor wording changes
3	Hannah Kohler (Director of Admissions and Student Support)	05/06/2019	Included reference to the LIS Detailed Data Retention Schedule. Created LIS Detailed Data Retention Schedule based on JISC guidance. Altered retention period for work submitted by students for assessment, including examination scripts, to end of academic year +3 years in line with best practice Data Retention Schedule. Clarified role of Registrar in relation to maintaining and updating the School's Detailed Data Retention Schedule and Data Retention Schedule Policy.
4	Hannah Kohler (Director of Admissions and Student Support)	10/08/2019	Clarification of roles and timelines in relation to review of Policy and associated Schedule
5	Board of Directors	18/11/2019	Approved



6	Hannah Kohler (Director of Strategy and Special Projects)	26/07/2021	Updated in line with requirements of Appendix D of Skilled Worker Sponsor and Student Sponsor Guidance
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