



Data Retention and Disposal Policy



A vital part of the College’s Data Protection Policy and practice is that personal data is retained for the appropriate period of time – neither too long nor too short.

The College has a duty to retain some staff and student personal data for a period of time following their departure from the College, mainly for legal reasons, but also for other purposes such as being able to provide references or for financial reasons, for example relating to pensions and taxation.

Some material will also be retained to form part of the official College archive for alumni purposes. Different categories of data will be retained for different periods of time, and these are set out in the below table.

The disposal of personal data

When a record containing personal data is to be disposed of, the following procedures will be followed:

- All paper documentation containing personal data will be permanently destroyed by shredding (using a commercial service).
- All computer equipment or media that are to be sold or scrapped will have had all personal data completely destroyed, by over-writing or degaussing or by physical destruction of the data drives – notably for Servers which have contained such data
- Employees will be provided with guidance as to the correct mechanisms for disposal of different types of personal data.

Category	Examples	Retention period
Student records	Student records, including enquiries, applications, admissions, assessment, exams awards, attendance and conduct Student records of those not completing enrolment	At least current year plus 10 years from the date that the student leaves College. At least 10 years for personal and academic references For ESF fully or co-funded provision at least until 31/12/2022 or as otherwise advised. Certain personal data may be held in perpetuity for alumni purposes Within one academic year
Financial records	Purchase ledger, sales ledger, cash book payments etc. Payroll Data	Current year plus six At least 10 years for ESF fully or co-funded provision.
Complaints	Correspondence with complainants	Current year plus six

Category	Examples	Retention period
Contractual arrangements	Service level agreements Legal contracts Tender documentation	Life of contract plus six years
Governors papers	Articles and Instruments Agendas and minutes of meetings	In perpetuity
Data Protection / FOI requests	Correspondence regarding DP/FOI requests	Current year plus six
Personnel records	Personnel files including training records, notes of disciplinary and grievance hearings, and appraisal forms Letters of reference Application forms/interview notes Facts relating to redundancies where fewer than 20 redundancies Facts relating to redundancies where 20 or more redundancies	Personnel files and training records (including disciplinary records and working time records) - retain for 10 years after employment ceases. However the records should be retained for a longer period if any of the following apply: <ul style="list-style-type: none"> • There were concerns about the behaviour of an adult who was working with children where s/he behaved in a way that has harmed, or may have harmed, a child; • The adult possibly committed a criminal offence against, or related to, a child; • The adult behaved towards a child in a way that indicates s/he is unsuitable to work with children. In such circumstances records should be retained at least until the adult reaches normal retirement age, or for 10 years if that is longer. 10 years from the end of employment At least 18 months from the date of the interviews 6 years from the date of redundancy 12 years from the date of redundancy

Category	Examples	Retention period
Health and Safety records	Medical records kept by reason of the Control of Substances Hazardous to Health Regulations 1999	Up to 50 years
	Accident books, and records and reports of accidents as required by HSE Regulations 1979; RIDDOR 1985	6 years
	Ionising Radiation Records as required by Ionising Radiations Regulations 1985	At least 50 years after last entry

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