

Information held for longer than is necessary carries additional risk and cost. Records and information should only be retained when there is a business need to do so. Under GDPR and the DPA 2018, personal data processed by the college must not be retained for longer than is necessary for its lawful purpose.

Most documents a business will create are covered by Section 5 of the Limitations Act 1980. This ensures that the documents are available if a civil case is brought against the business. Some record types can have separate, specific legislation which may fall under different retention terms.

**Data Protection Retention Schedule**

Document Name: Data Protection Retention Schedule

Department/Team: FMI/Data Protection

Review Date: June 2021

	Activity	Record Group	Retention Period	Citations and Notes
<p><b>Student Administration and Progress</b></p> <p>Student Administration and Progress</p>	<p>Student Administration and Support</p>	<p>Records containing personal data on individual students.</p>	<p>Minimum requirement varies for different types of personal data</p> <p>Recommended maximum retention: End of 'registered student' relationship with institution + 6 years.</p>	<p>Limitation Act, 1980.</p> <p>If the information forms part of the core record/transcript the retention may be longer (see below).</p> <p><i>Please note that this RRS applies to records from 01/08/2019 onwards, we advise users to observe any separate funding rules handed down by ESFA/appropriate funding bodies or any separate contract providers.</i></p> <p><i>More stringent safeguards are needed for special category data which includes information about an individual's:</i></p> <p><i>race;</i> <i>ethnic origin;</i> <i>politics;</i> <i>religion;</i> <i>trade union membership;</i> <i>genetics;</i> <i>biometrics (where used for ID purposes);</i> <i>health;</i> <i>sex life; or</i> <i>sexual orientation</i></p> <p><i>See the ICO website for more information.</i></p>
<p>Student Administration and Progress</p>	<p>Student Administration and Support - ESF funded students</p>	<p>Records containing personal data on individual ESF-funded students</p>	<p>31/12/2030</p> <p>To minimise risks of miscalculation and support Grant Recipients and the Managing Authority in simplifying processes, all projects under the ESF 2014 to 2020 Programme must ensure they keep all documents for 10 years after their final ESF claim is paid by the ESF Managing Authority. This is to ensure documents may be made available to the European Commission and European Court of Auditors upon request in accordance with Article 140 (1) of Regulation (EU) No 1303/2013.</p>	<p>ESF records must be easily identifiable and it is recommended that they are kept separately.</p> <p><a href="https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers#retention-of-records">https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers#retention-of-records</a></p> <p><i>More stringent safeguards are needed for special category data which includes information about an individual's:</i></p> <p><i>race;</i> <i>ethnic origin;</i> <i>politics;</i> <i>religion;</i> <i>trade union membership;</i> <i>genetics;</i> <i>biometrics (where used for ID purposes);</i> <i>health;</i> <i>sex life; or</i> <i>sexual orientation</i></p> <p><i>See the ICO website for more information.</i></p>

Student Administration and Progress	Student Administration and Support	The core record of a student as a learner	This is the minimal record kept to provide references for former students and may be retained for the lifetime of the student (80 years). A core (minimal) transcript may be retained indefinitely after this time and transferred to the archive if the institution has one. This depends on the requirements of the individual institution and their archival facilities/policies. The core record may vary according to the policy of each institution but is likely to contain name and dates of study, modules studied, and the qualifications conferred.	Sector norms/Institutional business requirements/Institutional charter/Institutional memory and archival requirements.  <i>For details on what may constitute the core student record see:</i>  <i>The European Credit Transfer and Accumulation System (ECTS) User Guide 2015</i> <i>What Is a Student Record? A Case Study by King's College London, Appendix IV</i>  <i>For more details on the HEAR, see the HEAR website and 'Beyond the Honours Degree – the Burgess Group Final Report' (October 2007)</i>  <i>Guidelines for HE Progress Files, QAA (2001)</i>  <i>Guide to the Diploma Supplement, UK HE Europe Unit (2006)</i>
Student Administration and Progress	Student Administration and Support	Records documenting the initial assessment of students including: 1. Student Qualifications on Entry 2. Key Skills Assessments 3. Care Student Assessments	Termination of student relationship + 6 years	Limitation Act 1980 c.58 1973 Prescription and Limitation (Scotland) Act 1973
Student Administration and Progress	Student Progress Administration	Individualised Student Record (ISRS). Individualised Learner Records.	Termination of student relationship + 6 years	Institutional business requirements.
Student Administration and Progress	Student Progress Administration - ESF-funded students	Individualised Student Record (ISRS). Individualised Learner Records for ESF-funded students	31/12/2030	ESF records must be easily identifiable and it is recommended that they are kept separately. <a href="https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers#retention-of-records">https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers#retention-of-records</a>
Student Administration and Progress	Student Progress Administration	Records documenting the handling of individual students'/employers' requests for statements of results/transcripts and requests for confirmation of individual students' awards, attendance or conduct from employers and other educational institutions.	Last action on request + 1 year	Institutional business requirements.
Student Administration and Progress	Student Progress Administration	Graduate Outcomes Surveys: individual responses	Completion of analysis of responses	<i>These should not be kept longer than necessary, and this should be stated in the privacy notice when the data was collected. After this period, responses can be anonymised for the purposes of analysis to ensure compliance with GDPR.</i>
Student Administration and Progress	Student Progress Administration	Records documenting the academic progress of individual students and formal action taken by the institution to deal with unsatisfactory progress, the transfer of individual students to new programmes or to new courses within programmes, the withdrawal of individual students from the institution, and the termination of individual students' programmes	Termination of relationship with student + 6 years	Limitation Act 1980 c. 58 s 5
Student Administration and Progress	Student Disciplinary and Appeals Case Handling	Records documenting the conduct and results of disciplinary proceedings against individual students and academic appeals.	Last action on case + 6 years	Limitation Act 1980 c. 58 s 5
Student Administration and Progress	Student Complaint Handling	Records documenting the handling of complaints by individual students where the formal complaints procedure is not initiated.	Last action on complaint + 3 years	Institutional business requirements.
Student Administration and Progress	Student Complaint Handling	Records documenting the handling of formal complaints made by individual students against the institution.	Last action on case + 6 years	Limitation Act 1980, c.58
<b>Student Recruitment</b>				
Student Recruitment	Student Recruitment	Records documenting the handling of enquiries from prospective students (subsequently registered as student).	Current academic year + 5 years  Where students did not subsequently enrol at the institutional, the records can be retained current academic year + 1 year.	Competitive Market Authority
<b>Student Admission, Registration and Induction</b>				
Student Admission, Registration and Induction	Student Admission	Records documenting the handling of applications for admission: successful applications.	End of student relationship + 6 years	Limitation Act 1980 c. 58 s 5
Student Admission, Registration and Induction	Student Admission	Records documenting the handling of applications for admission: unsuccessful applications.	Minimum: Completion of admissions process + 6 months. Recommended: Completion of admissions process + 1 year.	The Equality Act 2010  <i>Minimum: Actions under discrimination legislation must usually be brought within 6 months.</i>
Student Admission, Registration and Induction	Student Admission	Records documenting the administration of the clearing process.	Current academic year + 1 year	Institutional business requirements.
Student Admission, Registration and Induction	Student Admission	Records containing data on overall student numbers.	Current academic year + 1 year	Institutional business requirements.
Student Admission, Registration and Induction	Immigration Advice and Compliance	Records documenting immigration casework/compliance for students, including the retention of immigration permission from students.	6 years from last interaction relating to casework or 6 years after permanent withdrawal relating to immigration permission.	OISC Code of Standards: 2016

Student Admission, Registration and Induction	Student Registration	Records documenting the registration of individual students on programmes.	Termination of student relationship + 6 years	Limitation Act 1980 c. 58 s 5
<b>Student Financial Support</b>				
Student Financial Support	Financial Aid Funds Administration	Records documenting the provision of financial aid funds to individual students.	Current financial year + 6 years	Limitation Act 1980 c. 58 s 5
Student Financial Support	Crisis/Hardship Funds Administration	Records documenting the provision of crisis/hardship payments to individual students.	Current financial year + 6 years	Limitation Act 1980 c. 58 s 5
Student Financial Support	Bursaries Administration	Records documenting the award of bursaries to individual students.	Current financial year + 6 years	Limitation Act 1980 c. 58 s 5
Student Financial Support	Scholarships and Fellowships Administration	Records documenting the award of scholarships and fellowships to individual students.	Current financial year + 6 years	Limitation Act 1980 c. 58 s 5
Student Financial Support	Student Financial and Employment Support	Records of administration of Student Financial and employment support such as: -New Deal Records -Modern Apprenticeship Records -Access Fund Applications.	Current year + 6 years	Institutional business requirements.
Student Financial Support - ESF-funded	ESF-funded Administration	Records of eligible participants and any supporting evidence to confirm their eligibility to receive ESF support	31/12/2030	ESF records must be easily identifiable and it is recommended that they are kept separately. <a href="https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers#retention-of-records">https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers#retention-of-records</a>
<b>Student Support and Welfare Management</b>				
Student Support and Welfare Management	Student Support and Welfare Management	Student counselling services: case notes, letters to doctors etc.	Varies  <i>Sector Overview 003, University and College Counselling Services (BACP) says:</i>  <i>In making decisions as to how long to retain client records, services should take account of the sometimes conflicting considerations listed below:</i> • <i>the Data Protection Act, which states that sensitive data should not be kept for longer than is necessary</i> • <i>the policy of the institution</i> • <i>the ability of the service to store confidential records safely and securely over time</i> • <i>the likelihood that a client's records could be needed in the future, for example, for a criminal case or civil suit, in a claim for compensation, or for an internal university or college procedure such as an academic appeal or formal complaint. The length of time needed to retain records in such scenarios is extremely difficult to predict.</i>  <i>Each service will need to decide a realistic timescale that can best accommodate these considerations and what best practice would be in their context. An alternative position would be to shred all session notes, keeping a minimal factual</i>	Limitation Act, 1980.  British Association for Counselling and Psychotherapy (BACP) recommendations.  <i>The BACP Ethical Framework 2018 does not mandate the keeping of records but advises "keeping accurate and appropriate records", you should balance this against the requirements of data protection legislation which state that personal information should be kept no longer than necessary.</i>  <i>Counselling files contain Sensitive Information and are confidential.</i>
Student Support and Welfare Management	Student Support and Welfare Management	Records relating to the provision of Sports and Recreational facilities.	Current Year +3	Institutional business requirements.
Student Support and Welfare Management	Student Support and Welfare Management	Records relating to careers advice.	Duration of enrolment +3 years	The Equality Act 2010.
<b>Safeguarding</b>				
Safeguarding	Safeguarding records	All records included in the student's safeguarding file	Until the student reaches age 25 - then review	"Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018"  <a href="https://www.gov.uk/government/publications/data-protection-toolkit-for-schools">https://www.gov.uk/government/publications/data-protection-toolkit-for-schools</a>  IRMS - <a href="https://irms.org.uk/page/SchoolsToolkit">https://irms.org.uk/page/SchoolsToolkit</a>

Safeguarding	Safeguarding records	All records relating to individuals (adults) where concerns have been raised about them working with children	10 years or until the individual reaches retirement age (whichever is longer.)  Note: Allegations that are found to be malicious should be removed from personnel files.	"Keeping children safe in education Statutory guidance for schools and colleges 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018"  <a href="https://www.gov.uk/government/publications/data-protection-toolkit-for-schools">https://www.gov.uk/government/publications/data-protection-toolkit-for-schools</a>  IRMS - <a href="https://irms.org.uk/page/SchoolsToolkit">https://irms.org.uk/page/SchoolsToolkit</a>
<b>Student Surveys</b>				
Student Surveys	Student Communications Management	Results of student surveys: individual responses	Completion of analysis of survey responses	<i>The retention period will depend on what was stated in the privacy notice when the data was collected. After this period, responses can be anonymised for the purposes of analysis to ensure compliance with GDPR.</i>
Student Surveys	Student Communications Management	Results of student surveys: summaries and analyses of responses	Completion of survey + 5 years	Institutional business requirements.
Student Surveys	Student Communications Management	Records documenting the handling of suggestions from individual students.	Last action on suggestion + 1 year	Institutional business requirements.
<b>Tuition Fees</b>				
Tuition Fees	Tuition Fee Remission	Records documenting the handling of applications for remission of tuition fees: successful applications.	Determination of application + 6 years	Limitation Act 1980 c. 58 s 5
Tuition Fees	Tuition Fee Remission	Records documenting the handling of applications for remission of tuition fees: unsuccessful applications.	Determination of application + 1 year	Institutional business requirements.
Tuition Fees	Tuition Fee Collection	Records documenting the collection of tuition fees.	Current academic year + 1 year	Institutional business requirements.
<b>Academic Programme Administration and Awards</b>				
Academic Programme Administration and Awards	Academic Award Conferment	Records documenting the notification of awards to students and the issue of awards certificates.	Conferment of award + 1 year	Institutional business requirements. Certificates themselves must be sent to learner. Return all certificates to awarding body if not sent to learner.
Academic Programme Administration and Awards	Academic Award Conferment	Records documenting the process of inviting, receiving and considering nominations for honorary awards.	Conferment of award + 1 year	Institutional business requirements.
Academic Programme Administration and Awards	Academic Award Conferment	Records documenting offers of honorary awards and responses received.	Conferment of award + 1 year	Institutional business requirements.
Academic Programme Administration and Awards	Award Ceremony Administration	Records documenting the mailing of award certificates to students who do not attend ceremonies.	Completion of ceremony + 1 year	Institutional business requirements.
Academic Programme Administration and Awards	Prizes Administration	Records documenting nominations for prizes, the consideration of nominations and notifications to recipients of prizes.	Current academic year + 5 years	Institutional business requirements.
Academic Programme Administration and Awards	Prizes Administration	List of prize winners	While prize is awarded	Institutional business requirements.
<b>Assessment and Examination</b>				
Assessment and Examination	Assessment Administration	Records documenting the selection and appointment of examination invigilators.	Current academic year + 1 year	Institutional business requirements.
Assessment and Examination	Assessment Administration	Records documenting the delivery of training for examination invigilators.	Current academic year + 1 year	Institutional business requirements.
Assessment and Examination	Assessment Administration	Records documenting the organisation of examination facilities, including special arrangements for students with special needs.	Current academic year + 1 year	Institutional business requirements.
Assessment and Examination	Assessment Administration	Records documenting individual students' attendance at examinations, and the handling of reports of mitigating circumstances.	Current academic year + 1 year (minimum)	Institutional business requirements.
Assessment and Examination	Assessment Administration	Records documenting the collation of examination results and compilation of pass lists and individual notifications of results.	Current academic year + 1 year	Institutional business requirements.
Assessment and Examination	Assessment Administration	Records documenting individual students' submission of assessed work and handling of reports of mitigating circumstances.	Current academic year + 1 year	Institutional business requirements.
Assessment and Examination	Assessment Administration	Records documenting the issue of awards lists and individual notifications of awards.	Current academic year + 1 year	Institutional business requirements.
Assessment and Examination	Assessment Administration	Qualification Lists/Pass Lists/Awards lists.	Issue of list + 10 years	Institutional business requirements.
Assessment and Examination	Dissertations	Certain specified examples of past dissertations made available as examples to students of an excellent display of academic rigor.	Preserve in relevant University department once student consent for ongoing storage and access by third parties is received	Institutional business requirements.
Assessment and Examination	Examination Board Administration	Records documenting the conduct of the business of a committee: agenda, minutes and papers.	Current academic year + 6 years	Institutional business requirements.
Assessment and Examination	Examination Board Administration	Records documenting the conduct of the business of a committee: correspondence and other records relating to the preparation of committee business or to actions to be taken (or not taken) as a result of committee decisions.	Current academic year + 6 years	Institutional business requirements.
<b>Teaching</b>				
Teaching	Teaching Quality & Standards Management	Records documenting the conduct and results of formal internal and external reviews of teaching quality and standards, and responses to the results.	Current academic year + 5 years	Institutional business requirements.
Teaching	Taught Programme Review	Routine solicited feedback on taught programmes from staff and examiners: individual feedback.	Current academic year + 5 years OR Life of course + 1 year	Institutional business requirements.
Teaching	Taught Programme Review	Routine solicited feedback on taught programmes from students: individual feedback	Completion of analysis of feedback	Institutional business requirements
Teaching	Taught Programme Review	Reports of routine internal reviews of taught programmes and documentation of formal independent reviews of taught programmes, and the responses to the results.	Current academic year + 5 years	Institutional business requirements.
Teaching	Taught Student Assessment	Submitted/completed assessments (formative and summative assessments) and marks/grades given to submitted/completed summative assessments and, where appropriate, awards and classifications.	Current academic year + 6 years	Limitation Act 1980 c. 58 s 5
Teaching	Taught Student Monitoring & Support	Feedback on academic progress, and general academic guidance and support, given to individual taught students.	Completion of student's programme + 6 years	Limitation Act 1980 c. 58 s 5
<b>Education and Training</b>				
Education and Training	Education & Training Programme Assessment	Records documenting submitted/completed assessments: formative assessments.	Current academic year	Institutional business requirements.

Education and Training	Education & Training Programme Assessment	Records documenting submitted/completed assessments: summative assessments.	Confirmation of marks/grades + 6 months.	Institutional business requirements.
Education and Training	Education & Training Programme Assessment	Records documenting marks/grades given to submitted/completed summative assessments and, where appropriate, awards and classifications.	Current academic year + 6 years	Limitation Act, 1980 c. 58 s 5
<b>Learning Support</b>				
Learning Support	Learning Support Administration	Records relating to Learning Support for Students with specific needs.	Current year + 7 years	The Equality Act 2010  More stringent safeguards are needed for special category data which includes information about an individual's:  race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation  See the ICO website for more information.
<b>Equality and Diversity</b>				
Equality and Diversity	Discrimination Complaints Handling	Records documenting the handling of formal complaints about discrimination by or within the institution.	Last action on case + 6 years	Limitation Act 1980 c. 58 s 2
Equality and Diversity	Ethnic Minority Mentoring Scheme Co-ordination	Records documenting the handling of individual applications for the Scheme and monitoring of the mentor-mentee relationship and outcomes.	Completion of the Scheme + 1 year	Institutional business requirements.
<b>HR - Recruitment and Selection</b>				
Recruitment and Selection	Recruitment and Selection	Records documenting enquiries about vacancies and requests for application forms.	Completion of recruitment process	Institutional business requirements.  <i>A recruitment process is completed when an offer of employment has been made and has been accepted, AND when all unsuccessful applicants have been notified.</i>
Recruitment and Selection	Recruitment and Selection	Records documenting the handling of unsolicited applications for employment.	Receipt of application + 1 year	See Section 1.7 of the Employment Practices Code (Information Commissioner's Office, 2011).
Recruitment and Selection	Recruitment and Selection	Records of application forms (for all appointed applicants).	While employment continues and up to 7 years after employment ceases	Limitation Act 1980
Recruitment and Selection	Recruitment and Selection	Records documenting the handling of applications for vacancies: successful applications.	Termination of employment + 6 years (as part of employee contract records) except information which is not relevant to the ongoing employment relationship.	Limitation Act 1980 c. 58 s 5  <i>See Section 1.7 of the Employment Practices Code (Information Commissioner's Office, 2011).</i>  <i>For employment records, see HUMAN RESOURCES MANAGEMENT - EMPLOYEE CONTRACT MANAGEMENT).</i>
Recruitment and Selection	Recruitment and Selection	Records documenting the handling of applications for vacancies: unsuccessful applications.	Completion of recruitment process + 1 year.	The Equality Act 2010.  <i>See Section 1.7 of the Employment Practices Code (Information Commissioner's Office, 2011).</i>  <i>Actions under discrimination legislation must generally be brought within 6 months.</i>  <i>The Chartered Institute of Personnel and Development recommends '1 year'. See the factsheet Retention of personnel and other related records (2006).</i>  <i>Anonymised data may be held for a longer period (e.g. for equality monitoring purposes).</i>
Recruitment and Selection	Recruitment and Selection	Copies of unsuccessful candidate's right to work documents and qualifications taken at interview stage.	Completion of the recruitment process	Institutional business requirements.
Recruitment and Selection	Recruitment and Selection	Records of application forms for unsuccessful applicants where no Tier 2 sponsored person was appointed.	6 months after notifying unsuccessful candidates	Information Commissioner: Employment Practice Code Part 1: Recruitment and Selection (1.7.5)

Recruitment and Selection	Recruitment and Selection	Records of application forms for unsuccessful applicants in the medium received where a Tier 2 sponsored person was appointed.	For the life of the sponsorship plus 1 year (up to 7 years max)	Limitation Act 1980
Recruitment and Selection	Recruitment and Selection	Records documenting shortlisting information where no Tier 2 sponsored person was appointed.	6 months after the offer has been accepted by successful candidate	Information Commissioner: Employment Practice Code Part 1: Recruitment and Selection (1.7.5)
Recruitment and Selection	Recruitment and Selection	Records documenting shortlisting information for a role where a Tier 2 sponsored person was appointed.	For the life of the sponsorship plus 1 year (up to 7 years max)	Limitation Act 1980
Recruitment and Selection	Recruitment and Selection	Records of interview notes, interview summary outcomes and any tests (appointee and unsuccessful interviewees) where no Tier 2 sponsored person was appointed.	6 months	Information Commissioner: Employment Practice Code Part 1: Recruitment and Selection (1.7.5)
Recruitment and Selection	Recruitment and Selection	Records of interview notes, interview summary outcomes and any tests for all interviewed candidates (appointee and unsuccessful interviewees) where a Tier 2 sponsored person was appointed.	For the life of the sponsorship plus 1 year (up to 7 years max)	Limitation Act 1980
Recruitment and Selection	Recruitment and Selection	Copy of job description and person specification for a role where a Tier 2 sponsored person was appointed.	For the life of the sponsorship plus 1 year (up to 7 years max)	Limitation Act 1980
Recruitment and Selection	Recruitment and Selection	Copies of unsuccessful candidate's right to work documents and qualifications taken at interview stage.	Completion of the recruitment process	Institutional business requirements.
Recruitment and Selection	Recruitment and Selection	Any references obtained for unsuccessful candidates.	6 months after the offer has been accepted by successful candidate	Institutional business requirements.
Recruitment and Selection	Recruitment and Selection	Records documenting references provided in confidence in support of the employee's application(s) for employment by another organisation.	Provision of reference + 1 year	Institutional business requirements.
Recruitment and Selection	Workforce Training & Development	Individual feedback on training and development programmes.	Completion of analysis of feedback	Institutional business requirements.
Recruitment and Selection	Workforce Training & Development	(Anonymised) workforce feedback on training and development programmes.	Current year + 5 years	Institutional business requirements.
Recruitment and Selection	Workforce Performance Management	Summary (anonymised) results of employees' performance assessments.	Current year + 5 years	Institutional business requirements.
Recruitment and Selection	Workforce Remuneration & Reward Management	Pay reviews.	Current year + 6 years	Institutional business requirements.
Recruitment and Selection	Workforce Remuneration & Reward Management	Records documenting special reward schemes (e.g. Merit Reviews).	Termination of scheme + 6 years	Institutional business requirements.
<b>HR - Welfare and Relations</b>				
Welfare and Relations	Workforce Welfare Management	Records documenting the hours worked by employees, including those who have agreed to work more than 48 hours a week, as required by the Working Time Regulations 1998 (SI 1998/1833).	Date of record + 2 years	Working Time Regulations (SI 1998/1833) Regulations 5 and 9
Welfare and Relations	Workforce Welfare Management	Health assessments for night workers, and the results of assessments, as required by the Working Time Regulations 1998 (SI 1998/1833).	Date of record + 2 years	Working Time Regulations (SI 1998/1833) Regulations 5 and 9
Welfare and Relations	Workforce Relations Management	(Identifiable) individual responses to workforce surveys and consultations.	Completion of analysis of responses	The retention period will depend on what was stated in the privacy notice when the data was collected. After this period, responses can be anonymised for the purposes of analysis to ensure compliance with GDPR.
Welfare and Relations	Workforce Relations Management	Summary (anonymised) results of workforce surveys and consultations.	Completion of survey + 5 years	Institutional business requirements.
Welfare and Relations	Workforce Relations Management	Grievances raised by staff (which do not relate directly to their own contracts of employment), the institution's response, action taken and the outcome.	Last action on case + 6 years	Limitation Act 1980 c. 58 s 5
<b>HR - Industrial Relations and Pensions</b>				
Industrial Relations and Pensions	Industrial Relations Management	Records documenting routine communications with trade union representatives, including minutes of meetings.	Current year + 20 years	Institutional business requirements.
Industrial Relations and Pensions	Industrial Relations Management	Records documenting consultations/negotiations with trade unions on specific issues.	Last action on issue + 20 years	Institutional business requirements.
<b>HR - Employee Contract Management</b>				
Employee Contract Management	Employee Contract Management	Records documenting the employee's initial application for employment with the institution and supporting documentation supplied by third parties (e.g. references, Disclosure and Barring Service (DBS) checks).	Termination of employment + 6 years (as part of employee contract records) except information which is not relevant to the ongoing employment relationship.	Limitation Act 1980 c. 58 s 5  <i>See Section 1.7 of the Employment Practices Code (Information Commissioner's Office, 2011).</i>  <i>For employee contract records, see HUMAN RESOURCES MANAGEMENT - EMPLOYEE CONTRACT MANAGEMENT.</i>
Employee Contract Management	Employee Contract Management	Records documenting the employee's subsequent applications for other jobs within the institution.	Duration of job + 1 year	Institutional business requirements.
Employee Contract Management	Employee Contract Management	Records documenting the employee's contract(s) of employment with the institution.	Termination of employment + 6 years	Limitation Act 1980 c. 58 s 5
Employee Contract Management	Employee Contract Management	Records documenting changes to the employee's terms and conditions of employment.	Termination of employment + 6 years	Limitation Act 1980 c. 58 s 5
Employee Contract Management	Employee Contract Management	Job descriptions of positions held by the employee within the institution.	Duration of job + 1 year	Institutional business requirements.
Employee Contract Management	Employee Contract Management	Records documenting induction programmes attended by the employee.	Completion of induction + 1 year	Institutional business requirements.
Employee Contract Management	Employee Contract Management	Records documenting the employee's training and development needs, and the action taken to meet these needs.	Completion of actions + 5 years	Institutional business requirements.
Employee Contract Management	Employee Contract Management	Records documenting job-specific statutory/regulatory training requirements for the employee, and the training provided to meet these requirements.	Expiry of certification + 6 years OR Superseded + 6 years	Limitation Act 1980 c. 58 s 5
Employee Contract Management	Employee Contract Management	Routine assessments/reviews of the employee's performance, and any consequent action taken.	Superseded + 3 years	Institutional business requirements.

Employee Contract Management	Employee Contract Management	Records documenting disciplinary proceedings against the employee, where employment continues.	Closure of case + 6 years	Common HR practice  <i>Chartered Institute of Personnel and Development recommends '6 years after employment ceases'. See Retention of personnel and other related records (Chartered Institution of Personnel and Development, 2018).</i>
Employee Contract Management	Employee Contract Management	Records documenting grievances raised by the employee which relate directly to his/her own contract of employment, the institution's response, action taken and the outcome.	Closure of case + 6 years	Common HR practice  <i>Chartered Institute of Personnel and Development recommends '6 years after employment ceases'. See Retention of personnel and other related records (Chartered Institution of Personnel and Development, 2018).</i>
Employee Contract Management	Employee Contract Management	Records documenting the employee's remuneration and rewards (e.g. bonuses, merit awards, long service awards).	Minimum: Current tax year + 3 years  Recommended: Current tax year + 6 years	Limitation Act 1980 c. 58 s 5  Minimum: The Income Tax (Pay As You Earn) Regulations (SI 2003/2682) Regulation 97(8) The National Minimum Wage Regulations 2015 (Part 7)  Recommended: Taxes Management Act 1970 c. 9 s 34  <i>For payroll records, see FINANCE MANAGEMENT - PAYROLL ADMINISTRATION.</i>
Employee Contract Management	Employee Contract Management	Records relating to the administration of the employee's contractual holiday entitlement.	Current year + 1 year	Institutional business requirements.
Employee Contract Management	Employee Contract Management	Records documenting the employee's absence due to sickness.	End of employment + 6 years	The Statutory Sick Pay (Maintenance of Records) (Revocation) Regulations 2014 (SI 2014/55).  Limitation Act, 1980.  <i>SI 2014/55 abolished the former obligation on employers to keep these records. Although there is no longer a specific statutory retention period, employers still have to keep sickness records to best suit their business needs. It is advisable to keep records for at least 3 months after the end of the period of sick leave in case of a disability discrimination claim. However, if there were to be a contractual claim for breach of an employment contract it may be safer to keep records for 6 years after the employment ceases.</i>
Employee Contract Management	Employee Contract Management	Records documenting the authorisation and administration of special leave, e.g. compassionate leave, study leave.	Current year + 1 year	Institutional business requirements.
Employee Contract Management	Employee Contract Management	Records documenting the authorisation and administration of statutory leave entitlements, e.g. parental leave.	Completion of entitlement + 6 years	The Maternity and Parental Leave etc. Regulations 1999 (SI 1999/3312)
Employee Contract Management	Employee Contract Management	Records documenting entitlements to, and calculations of, Statutory Maternity Pay.	Current Tax Year + 3 years	The Statutory Maternity Pay (General) Regulations (SI 1986/1960 Regulation 26)
Employee Contract Management	Employee Contract Management	Records containing employee's basic personal details (e.g. address, next of kin, emergency contacts).	Superseded	Institutional business requirements.
Employee Contract Management	Employee Contract Management	Records documenting pre-employment health screening of an employee: employees exposed to hazardous substances during employment.	See HEALTH & SAFETY MANAGEMENT - HAZARDOUS SUBSTANCE EXPOSURE CONTROL.	Institutional business requirements.
Employee Contract Management	Employee Contract Management	Records documenting pre-employment health screening of an employee: other employees.	Termination of employment + 6 years	Limitation Act 1980 c. 58 s 5
Employee Contract Management	Employee Contract Management	Records documenting the issue of personal protective equipment/other special equipment to an employee.	Termination of employment + 6 years	Limitation Act 1980 c. 58 s 5
Employee Contract Management	Employee Contract Management	Records documenting major injuries to an employee arising from accidents in the workplace.	Termination of employment + 40 years	Health and Safety Regulations.
Employee Contract Management	Employee Contract Management	Records documenting the employee's termination of employment by voluntary resignation, redundancy, retirement (including on medical grounds) or dismissal.	Termination of employment + 6 years	Limitation Act 1980 c. 58 s 5
Employee Contract Management	Employee Contract Management	Records documenting references provided in confidence in support of the employee's application(s) for employment by another organisation.	Provision of reference + 1 year	Institutional business requirements.
Employee Contract Management	Employee Contract Management	Records documenting right to work and immigration information	2 years after the termination of employment	Immigration, Asylum and Nationality Act 2006 and Limitation Act 1980
<b>HR - Payroll</b>				
Payroll	Payroll Administration	Records documenting employees' authorisation for non-statutory payroll deductions.	Current tax year + 6 years	Limitation Act 1980 c. 58 s 5

Payroll	Payroll Administration	Employer's PAYE records which are not required to be sent to the Inland Revenue (under the provisions of the Income Tax (Pay As You Earn) Regulations 2003.	Minimum: Current tax year + 3 years Recommended: Current tax year + 6 years	The Income Tax (Pay As You Earn) Regulations (SI 2003/2682) Regulation 97(8)  <i>'PAYE records' are defined in Regulation 97(2) of the Income Tax (Pay As You Earn) Regulations 2003 (SI 2003/2682).</i>
Payroll	Payroll Administration	Records documenting the administration of payments made under the Statutory Sick Pay scheme.	Minimum: Current tax year + 3 years Recommended: Current tax year + 6 years	The Statutory Sick Pay (Maintenance of Records) (Revocation) Regulations 2014 (SI 2014/55).
Payroll	Payroll Administration	Records documenting the administration of payments made under the Statutory Maternity Pay scheme.	Minimum: Current tax year + 3 years Recommended: Current tax year + 6 years	The Statutory Maternity Pay (General) Regulations (SI 1986/1960) Regulation 26
Payroll	Payroll Administration	Record of P45's	While employment continues and up to 7 years after employment ceases	Limitation Act, 1980
Payroll	Pension Contributions Administration	Records documenting payments of the institution's employers' contributions to pensions schemes for its employees.	Death of last known beneficiary of member + 6 years	The Retirement Benefits Schemes (Information Powers) Regulations 1995 s.15 (SI 1995/3103)
Payroll	Pension Contributions Administration	Records documenting payments of the institution's employees' contributions to pension schemes.	Death of last known beneficiary of member + 6 years	The Retirement Benefits Schemes (Information Powers) Regulations 1995 s.15 (SI 1995/3103)
<b>Finance</b>				
Finance	Financial Accounting	Records documenting the issue of sales invoices and the processing of incoming payments.	Current financial year + 6 years	Taxes Management Act 1970 c. 9 s 34 Limitation Act 1980 c. 58 s 5 Value Added Tax Act 1994 c. 23 HMRC VAT Notice 700/21 para. 5.2
Finance	Financial Accounting	Records documenting the receipt and payment of purchase invoices.	Current financial year + 6 years	Taxes Management Act 1970 c. 9 s 34 Limitation Act 1980 c. 58 s 5 Value Added Tax Act 1994 c. 23 HMRC VAT Notice 700/21 para. 5.2
Finance	Financial Accounting	Records documenting the payment and/or reimbursement of employees' expenses.	Current financial year + 6 years	Taxes Management Act 1970 c. 9 s 34 Limitation Act 1980 c. 58 s 5
Finance	Financial Accounting	Records documenting the payment of honoraria to third parties.*  *Unless honoraria are administered through the payroll.	Current financial year + 6 years	Taxes Management Act 1970 c. 9 s 34 Limitation Act 1980 c. 58 s 5
Finance	Financial Accounting	Records documenting the payment of expenses to third parties (e.g. honorary appointees).	Current financial year + 6 years	Taxes Management Act 1970 c. 9 s 34 Limitation Act 1980 c. 58 s 5
Finance	Financial Accounting	Records documenting the handling of petty cash.	Current financial year + 6 years	Limitation Act 1980 c. 58 s 5 Value Added Tax Act 1994 c. 23 HMRC VAT Notice 700/21 para. 5.2
Finance	Financial Accounting	Records documenting the receipt and processing of tuition fees.	Current financial year + 6 years	Taxes Management Act 1970 c. 9 s 34 Limitation Act 1980 c. 58 s 5
Finance	Financial Accounting	Apprenticeship levy records	Current financial year + 3 years	Income Tax (Pay As You Earn) (Amendment) Regulations 2017, 147N.
Finance	Funding Management	Records documenting the administration of scholarship funds.	Current financial year + 6 years	Limitation Act 1980 c. 58 s 5
Tax and Cash Management	Cash Management	Records documenting standing orders, direct debits etc.	Life of instruction + 6 years	Limitation Act 1980 c. 58 s 5.
Tax and Cash Management	Cash Management	Records documenting routine bank account deposits/withdrawals/transfers (paying-in slips, transfer instructions, bank statements etc.)	Current financial year + 6 years	Taxes Management Act 1970 c. 9 s 34 Limitation Act 1980 c. 58 s 5.
<b>Marketing and Communications</b>				
Marketing and Communications	Market Research	Market research data: data relating to identifiable individuals.	Completion of analysis of data	Institutional business requirements.  <i>The institution may wish to transfer these records to the archive once they are no longer in active use.</i>
Marketing and Communications	Market Research	Market research data: aggregated data and analyses.	Completion of research + 5 years	Institutional business requirements.  <i>The institution may wish to transfer these records to the archive once they are no longer in active use.</i>
Marketing and Communications	Direct-Marketing	Direct-marketing records containing personal data such as mailing lists	Creation + 2 years	<i>Institutional business requirements.</i>  <i>A shorter/longer period may be appropriate where the customer opts-out sooner or actively opts-in for the data to be used for a longer, defined period.</i>
<b>Information Communication Technology (ICT)</b>				
Information Communication Technology (ICT)	ICT Systems Operations Management	Records documenting faults reported by users of ICT systems, and action taken to investigate and resolve the problem.	Last action on fault + 1 year	Institutional business requirements.

Information Communication Technology (ICT)	ICT Systems Operations Management	User requests to recover data from backup or archive stores, and action taken.	Last action on request + 3 months	Institutional business requirements.
Information Communication Technology (ICT)	ICT Systems Security Management	Records documenting the opening, maintenance and closure of user accounts for ICT systems.	Closure of account + 1 year	Institutional business requirements.
Information Communication Technology (ICT)	ICT Systems Training	Records documenting the development of technical and application training for ICT system users.	Superseded + 1 year	Institutional business requirements.
<b>Equipment</b>				
Equipment	Equipment & Consumables Disposal	Records documenting the transfer of ownership of equipment/consumables.	Disposal of item + 1 year	Institutional business requirements.
<b>Information Strategy and Data Protection</b>				
Information Strategy and Data Protection	Data Protection Compliance	Records documenting the handling of requests for access to personal information held by the institution under the General Data Protection Regulation (GDPR).	Last action on request + 2 years	Common practice  GDPR does not prescribe a retention period for these records and the ICO does not advise a specific retention period.  A longer retention period may be appropriate for records documenting the handling of requests which resulted in complaints or appeals.
Information Strategy and Data Protection	Data Protection Compliance	Records documenting the handling of data incidents/breaches	Last action on incident + 6 years	Limitation Act 1980 c. 58 s 5
Information Strategy and Data Protection	Data Protection Compliance	(Anonymised) statistics, analyses and reports of requests for access to personal information held by the institution under current data protection laws (the Data Protection Act 2018 and General Data Protection Regulation (GDPR) (EU) 2016/679).	Current year + 10 years	Institutional business requirements.
<b>Freedom of Information</b>				
Freedom of Information	Freedom of Information Compliance	Records documenting the handling of requests for information held by the institution, made under the Freedom of Information Act 2000 (c. 36) or the Freedom of Information (Scotland) Act 2002 (asp 13).	Completion of request handling process + 3 years	Freedom of Information Act 2000  Records created by a public body fulfilling its obligations under the Freedom of Information Act 2000 (The National Archives).  The National Archives recommends '3 years after date of creation'. See Model Retention Schedule for Records Created by a Public Body Fulfilling FOI obligations (The National Archives).  Records (or information extracted from them) relating to cases which set legal precedents, or which establish principles for handling requests for certain types of information should be kept for longer, possibly as part of policy development records (see INFORMATION COMPLIANCE MANAGEMENT - INFORMATION COMPLIANCE POLICY DEVELOPMENT).  A request handling process is completed when the request has been fulfilled or when all complaints and/or appeals (against non-disclosure of information or methods of handling the request) have been determined.  See 'Definition document for universities and other higher education institutions' and 'Definition document for colleges of further education' ICO (2013).
Freedom of Information	Freedom of Information Compliance	(Anonymised) management statistics, analyses and reports of requests for information held by the institution, made under the Freedom of Information Act 2000 (c. 36) or the Freedom of Information (Scotland) Act 2002 (asp 13).	Current year + 10 years	Freedom of Information Act 2000  Records created by a public body fulfilling its obligations under the Freedom of Information Act 2000 (The National Archives).  See 'Definition document for universities and other higher education institutions' and 'Definition document for colleges of further education' ICO (2013).
<b>Policy and Planning</b>				
Policy and Planning	Public Communications Management	Enquiries from members of the public and the responses provided.	Last action on enquiry + 1 year	Institutional business requirements.
Policy and Planning	Public Communications Management	Unsolicited feedback from members of the public, the internal handling of this feedback and the responses provided.	Last action on feedback + 1 year	Institutional business requirements.
Policy and Planning	Public Communications Management	Results of public surveys: individual responses.	Completion of analysis of survey responses	The retention period will depend on what was stated in the privacy notice when the data was collected. After this period, responses can be anonymised for the purposes of analysis to ensure compliance with GDPR.

Policy and Planning	Public Communications Management	Complaints from members of the public, the internal handling of these complaints and the responses provided.	Last action on complaint + 1 year	Institutional business requirements.
<b>Estates</b>				
Estates	Property Security Management	Records of security passes issued to visitors	Expiry of pass + 1 month	Institutional business requirements.
Estates	Property Security Management	Records of security passes issued to employees, other staff and students.	Expiry of pass + 1 year	Institutional business requirements.
Estates	Property Security Management	Records documenting the conduct of routine security surveillance of properties.	Creation + 1 month	Institutional business requirements.
Estates	Property Security Management	Records documenting security breaches or incidents, and action taken.	Last action on incident + 1 year	Institutional business requirements.
<b>Health and Safety</b>				
Health and Safety	Health & Safety Incident Recording, Reporting & Investigation	Records documenting immediate investigations into possible accidental release or theft of radioactive substances, where accidental release or theft was found to have occurred, to fulfil the institution's duties under Regulation 30 of the Ionising Radiations Regulations 2012 (SI 2012/632).	Date of report + 50 years	Ionising Radiations Regulations (SI 2017/1075) Regulation 30
Health and Safety	Health & Safety Incident Recording, Reporting & Investigation	Records of injuries, dangerous occurrences and outbreaks of notifiable diseases on the institution's premises, to fulfil the institution's duties under Regulation 7 of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (SI 2013/1471).	Date of recording + 3 years	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (SI 2013/1471) Regulation 7(3) The Social Security (Claims and Payments) Amendment (No. 3) Regulations (SI 1993/2113) Regulation 2  The contents of records to be kept are specified in Schedule 4 of (SI 2013/1471).
Health and Safety	Health & Safety Incident Recording, Reporting & Investigation	Records documenting the investigation of accidents, dangerous occurrences and outbreaks of notifiable diseases on the institution's premises.	Closure of investigation + 40 years	Limitation Act 1980 c. 58 s 11
Health and Safety	Health & Safety Incident Recording, Reporting & 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	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (SI 2013/1471) Regulation 7(3)
<b>Policy and Planning</b>				
Policy and Planning	Public Communications Management	Enquiries from members of the public and the responses provided.	Last action on enquiry + 1 year	Institutional business requirements.
Policy and Planning	Public Communications Management	Unsolicited feedback from members of the public, the internal handling of this feedback and the responses provided.	Last action on feedback + 1 year	Institutional business requirements.
Policy and Planning	Public Communications Management	Results of public surveys: individual responses.	Completion of analysis of survey responses	The retention period will depend on what was stated in the privacy notice when the data was collected. After this period, responses can be anonymised for the purposes of analysis to ensure compliance with GDPR.
Policy and Planning	Public Communications Management	Results of public surveys: summaries and analyses of responses	Completion of survey + 3 years	Institutional business requirements.
Policy and Planning	Public Communications Management	Complaints from members of the public, the internal handling of these complaints and the responses provided.	Last action on complaint + 1 year	Institutional business requirements.
<b>Media Relations</b>				
Media Relations	Media Communications Management	Records documenting the institution's media contacts.	Superseded	Institutional business requirements.
Media Relations	Media Communications Management	Transcripts of media briefings	Date of briefing + 5 years	Institutional business requirements.
Media Relations	Media Communications Management	Transcripts of media interviews.	Date of interview + 5 years	Institutional business requirements.
Media Relations	Media Communications Management	Records documenting media enquiries, the internal handling of these enquiries and responses provided.	Last action on enquiry + 3 years	Institutional business requirements.
<b>Community Relations</b>				
Community Relations	Community Communications Management	Enquiries from members of the local community and the responses provided.	Last action of enquiry + 1 year	Institutional business requirements.
Community Relations	Community Communications Management	Unsolicited feedback from members of the local community, the internal handling of this feedback and the responses provided.	Last action on feedback + 1 year	Institutional business requirements.
Community Relations	Community Communications Management	Records documenting the design and conduct of community surveys.	Completion of survey + 3 years	Institutional business requirements.
Community Relations	Community Communications Management	Results of community surveys: individual responses.	Completion of analysis of survey responses	<i>The retention period will depend on what was stated in the privacy notice when the data was collected. After this period, responses can be anonymised for the purposes of analysis to ensure compliance with GDPR.</i>
Community Relations	Community Communications Management	Complaints from members of the local community, the internal handling of these complaints and the responses provided.	Last action on complaint + 1 year	Institutional business requirements.
<b>Alumni Relations</b>				
Alumni Relations	Alumni Records Administration	Records containing personal data on individual alumni.	While current (or likely to be current)	Institutional business requirements.
Alumni Relations	Alumni Communications Management	Records documenting the design, planning and production of official alumni communications.	Issue of communication + 1 year	Institutional business requirements.
Alumni Relations	Alumni Communications Management	Alumni communications	Issue + 1 year	Institutional business requirements.
Alumni Relations	Alumni Communications Management	Records documenting enquiries from alumni and the responses provided.	Last action on enquiry + 1 year	Institutional business requirements.
Alumni Relations	Alumni Communications Management	Unsolicited feedback from alumni, the internal handling of this feedback and the responses provided.	Last action on feedback + 1 year	Institutional business requirements.
Alumni Relations	Alumni Communications Management	Results of alumni surveys: individual responses	Completion of analysis of survey responses	<i>The retention period will depend on what was stated in the privacy notice when the data was collected. After this period, responses can be anonymised for the purposes of analysis to ensure compliance with GDPR.</i>
Alumni Relations	Alumni Communications Management	Records documenting the handling of complaints from alumni.	Last action on complaint + 6 years	<i>Retention for a longer period may be appropriate if the complaint, or the handling of the complaint, could be a basis for legal action against the institution.</i>
Alumni Relations	Alumni Support	Requests for contact details for alumni, action taken, and the responses provided.	Last action on request + 1 year	Institutional business requirements.

<b>Fundraising and Donations</b>				
Fundraising and Donations	Fundraising Campaign Management	Individual responses to fundraising campaigns.	Completion of analysis of data	Institutional business requirements.
Fundraising and Donations	Donations Management	Records documenting the handling of enquiries about making donations to the institution.	Last action on enquiry + 1 year	Institutional business requirements.
Fundraising and Donations	Donations Management	Records documenting donations to the institution.	Current year + 5 years	<i>A shorter/longer period may be appropriate for small/substantial donations.</i>