




Quality System

Policy Number

POL-DP-04

Policy Title

Data Retention Policy

Written by: 	Checked by: 	Equality Impact Assessed by: 
Author: <i>Vicky Nelson</i>	Manager: <i>Lee Phillips</i>	Assessor: <i>Vicky Nelson</i>



1.0 Introduction

The General Data Protection Regulation (GDPR) requires that all entities of the Bishop Auckland College (BAC) Group do not keep personal data for longer than is necessary. This policy aims to set out the Organisation's data retention periods that need to be adhered to by all members of staff.

Once personal data is no longer required, it should be securely deleted/destroyed in accordance with the retention period set.

2.0 Scope

- 2.1 This Policy covers the whole of the BAC Group, including Bishop Auckland College, BAC Community Venues, BAC Nursey and South West Durham Training. For the purpose of this Policy, BAC Group will be referred to as 'the Organisation'.
- 2.2 This Policy applies to all permanent, temporary and contracted staff who work at the Organisation.
- 2.3 This Policy explains how the Organisation complies with our legal obligation not to keep personal data for longer than we need it and sets out when different types of personal data will be deleted. In particular, it sets out details of the Organisation's policies for the retention of Special Category personal data.

3.0 Policy

- 3.1 The Organisation must, in respect of its processing of personal data, comply with the Data Protection Act 2018, the GDPR 2016/679, and related legislation (together, "Data Protection Laws").
- 3.2 The Retention Policy should be read in conjunction with the Organisation General Data Protection Regulation Policy, which sets out the Organisation's overall approach to data protection matters and sets out the rationale for why a Retention Policy is required for personal data.
- 3.3 The Organisation is under a legal obligation only to keep personal data for as long as the Organisation needs it. Once the Organisation no longer needs personal data, the Organisation must securely delete it. The Organisation recognises that the correct and lawful treatment of data will maintain confidence in the Organisation and will provide for a successful working environment.
- 3.4 All Organisation employees must comply with this policy at all times. If you have any queries regarding this Policy, please consult your manager and/or the Data Protection Officer. You are advised that any breach of this policy will be treated seriously and may result in disciplinary action being taken against you.

4.0 Data Retention Periods

- 4.1 The Organisation has assessed the types of personal data that it holds and the purpose it is used for, this is detailed in departmental Data Asset Registers. The table in appendix 1 sets out the retention periods that is required for the different departments within the Organisation, and the different types of data that they each hold.
- 4.2 If any member of staff considers that a particular piece of personal data needs to be kept for more or less time than the period set out in this policy, please contact the Data Protection Officer for guidance.

5.0 Changes to this Policy

The Organisation reserves the right to change this Policy at any time.

For further information contact:

Vicky Nelson
Data Protection Officer/Quality Assurance Manager

Appendix 1

Data Retention Periods (detailed)

Section	Records Held (type of data)	Retention Timescales (years)	Action following retention
Curriculum	Course file information – Inc. Class lists, Induction records, course programme assessment schedule, tracking documentation, copy of student results, Early leavers, final destination/ progression of remaining students.	Current academic year+5	Destroy
	IV/EE documentation as required by Awarding Organisation	Current academic year + 3 years	
	Pearson - Qualification Teacher Assessed Grades (Q-TAGs) and Higher National Unit Teacher Assessed Grades (U-TAGs)	You must retain the evidence which is used to support a Qualification Teacher Assessed Grade and Higher National Unit Teacher Assessed Grade used within your assessment until 6 months after the date of the issue of the result, or the conclusion of any complaint, malpractice investigation or appeal in relation to that result, whichever is later.	Destroy
	TAGs and Adaptations All other awarding organisations where applicable	You must retain the evidence which is used to support a Teacher Assessed Grade (TAG) and/or any adaptation until after your next EQA remote sampling activity or visit, following the date of the issue of the result, or the conclusion of any complaint, malpractice investigation or appeal in relation to that result, whichever is later.	Destroy
	Assessed student work	After certification +12 weeks (Pearson BTEC only).	Destroy

Section	Records Held (type of data)	Retention Timescales (years)	Action following retention
Curriculum		For all other awarding organisations and in order to maintain Direct Claim Status (DCS). Following learner certification, student assessed work and associated IV/IQA/Moderation records which are not part of the current years EQA sample MUST be retained and stored safely and securely for potential inspection and scrutiny at the next EQA/EE/SV visit.	
	Learner evidence and assessment records	Current academic year +3	Destroy
HE	Statutory External returns (i.e. HESA and HEFCE to be replaced with OFS statistics) and the data used to compile these	Current academic year + 6	Destroy
	Diploma supplement and transcript information OU validated awards	Student DOB +120	Destroy
Finance	Payroll Records	Current Tax Year + 5	Destroy
	Salary Details	Current Tax Year + 5	Destroy
	P45	Current Tax Year + 5	Destroy
	P60 Lists	Current Tax Year + 2	Destroy
	Pension Documents	Termination of employment +75	Destroy
	Annual Accounts	Previous Academic Year + 6 + Archive	Destroy
	Monthly Financial Statements	Current Academic Year + 6	Destroy
	Internal Audit Reports	Current Financial Year + 6	Destroy
	External Audit Reports	Previous Academic Year + 6	Destroy
	Tax Documentation	Current Financial Year + 5	Destroy
	VAT Administration	Current Tax Year + 5	Destroy
	Bursary Files	Current Academic Year + 6	Destroy
Records of Student Fees	Current Academic Year + 6	Destroy	

Section	Records Held (type of data)	Retention Timescales (years)	Action following retention
Finance	Student funding arrangements	Current Academic Year + 6	Destroy
	Travel/Staff Expenses, etc.	Current Financial Year + 6	Destroy
	Register of Expenses	Current Academic Year + Archive	Permanent
	BACS Prints	Current Financial Year + 3	Destroy
	Legal Costs	Current Financial Year + 6	Destroy
	Invoices	Current Academic Year + 6	Destroy
	Orders	Current Academic Year + 6	Destroy
	Purchase Records	Current Tax Year + 6	Destroy
	Insurance Policies	40 Years	Destroy
Employers liability claims	Permanent	Held in filing cabinet & archived	
Human Resources	Current Staff Details	Retain and check currency	Retain
	Former Staff Details	Date of Termination + 10	Destroy
	Staff Career Development Reviews (appraisal)	Retain for current staff. Former Staff Termination +10	Retain/Destroy
	Attendance Records	Date of Termination + 10	Destroy
	Occupational Health Reports	Date of Termination + 10	Destroy
	Exit Interview Forms	Date of Termination + 10	Destroy
	Employment Tribunal Records	Date of Termination + 10	Destroy
	Parental Leave Requests	Year of Birth + 8 (18 if DLA)	Destroy
	Personal and Domestic Leave Requests	Date of Termination + 10	Destroy
	Declaration of Outside Employment	Date of Termination + 10	Destroy
	Holiday/Leave Registers	Date of Termination + 2	Destroy
	References	Date of Termination + 10	Destroy
	Disclosure Certificates	Record Receipt Only	Destroy
	Disciplinary Records	Date of Termination + 10	Destroy
	Grievance Records	Date of Termination + 10	Destroy
Capability Records	Date of Termination + 10	Destroy	

Section	Records Held (type of data)	Retention Timescales (years)	Action following retention
Human Resources	Agency Worker CV	Active +1	Destroy
	Data held on HR system	Date of Termination + 10	Destroy
	Maternity Leave Requests	Date of Termination + 10	Destroy
	Personnel Files	Date of Termination + 10	Destroy
	Training Records	Date of Termination + 10	Destroy
	Redundancy Details	Active + 6	Destroy
	Trade Union Agreements	Active + 10	Destroy
	Recruitment documents	Completion of appointment + 4 months if unsuccessful Termination of employment + 10 years if successful	Destroy
	Successful post applications	Transfer to staff file	Transfer to staff file
	Unsuccessful post applications	4 months	Destroy
Health and Safety	Interview notes	Completion of appointment + 4 months if unsuccessful Termination of employment + 10 years if successful	Destroy
	Health and Safety Reports	Current Academic Year + 5	Destroy
	Health and Safety Records	40 (COSHH)	Destroy
	Legal Documentation	Permanent	Archive
	Risk Assessment Reports	Review of Assessment + 5	Destroy
	Health and Safety correspondence	Current academic year + 5	Destroy
	Safety Training Records	Current academic year + 6	Destroy
	Fire risk certificates	Permanent	Archive
	Fire Risk Assessment and Fire Plans	Active	Archive
	PPE Maintenance and Examination	Current financial year + 5	Destroy
	LEV Monitoring	Date of monitoring + 5	Destroy
	Lifting Operations – Examinations	Active	Active
Fire Occurrence Records	Current Academic Year + 5	Destroy	

Section	Records Held (type of data)	Retention Timescales (years)	Action following retention
	First Aid incident report forms	3 years after the incident. Or 3 years after the child reaches 18.	Destroy
Estates	Building Plans	Permanent	Permanent
	Resources Management	Current Financial Year + 2	Destroy
	Legal Documentation	Permanent	Permanent
	Waste Transfer Notes	Removal of waste + 3 years	Destroy
	Waste Consignment Notes	Removal of waste + 3 years	Destroy
	Security Information	Current Academic Year + 5	Destroy
	Leased Property Files	End of lease + 5	Destroy
	Property Files	Current Financial Year + 5	Destroy
	Job Files	End of lease + 5	Destroy
	Leases	End of lease + 5	Destroy
	CCTV recordings	Creation + 1 month	Destroy unless legally required
Record Management	Data Asset Register	Active	Active
Student Services	Student Pastoral Care	Current Academic Year + 6	Destroy
	Visitor Signing-in Sheets	Current Academic Year	Destroy
Admissions	Application Forms	Current Academic Year + 2	Destroy
	Application Checklists	Current Academic Year + 2	Destroy
Marketing	Promotional Material	Current Academic Year + Archive	Archive
	Public Relations	Current Academic Year + Archive	Archive
	School Liaison	Current Academic Year + Archive	Archive
	Press Cuttings	Current Academic Year + Archive	Archive
	Prospectuses	Current Academic Year + Archive	Archive
Registry	Student Registry Files	Current Academic Year + 6	Destroy
	Student Registry Files where ESF match funding has been received	10 years from end of the project year	Prior to destruction of any documents, seek

Section	Records Held (type of data)	Retention Timescales (years)	Action following retention
Registry			confirmation from the Managing Authority.
	Registers	Current Academic Year + 6	Destroy
	Student Records	Current Academic Year + 6	Destroy
	Evidence of the arrangements for conducting examinations	Current Academic year + 2	Destroy
	Exam Results	Completion of programme + 10	Destroy
Employment Services	Project documents relating to ESF funded courses	10 years after the final claim is paid by ESF Managing Authority	Prior to destruction of any documents, seek confirmation from the Managing Authority.
	Detailed records and documentation where projects are operating under a State Aid scheme *	10 years after the last aid is granted under the scheme	Prior to destruction of any documents, seek confirmation from the Managing Authority.
IT Services	Functional Specifications	Active + 2	Destroy
	Current Technical Specifications	Active + 1	Destroy
	Operating Logs	Active + 1	Destroy
	Security Incident Reports	Current Academic Year + 5	Destroy
	Emails	Active + 1	Destroy
	Personal Network Storage	Active +1	Destroy
	Photocopying Logs	Deleted after 1 year	Destroy
Quality	Internal Quality Audit Documents	Current Academic year + 5	Destroy
	Complaints	Current Academic year + 6	Destroy
	External Examiner/EV/EQA process	Current Academic Year + 4	Destroy
	Student Surveys	Current Academic Year + 3	Destroy
	Employer Surveys	Current Academic Year + 3	Destroy
	Parent / Carer 16-18 Surveys	Current Academic Year + 3	Destroy
	Freedom of Information Requests	Current Academic Year + 6	Destroy

Section	Records Held (type of data)	Retention Timescales (years)	Action following retention
	Data Subject Access Requests	Current Academic Year + 6	Destroy
	Suggestions	Current Academic Year + 2	Destroy
	Self Assessment Reports	Current Academic Year + 6	Destroy
	Records documenting observations of teaching and learning	Current Academic Year + 5	Destroy
Corporate Board	Governor Appointments	Termination of appointment + 6	Destroy
	Annual Governor Audit	Termination of appointment + 6	Destroy
	Meetings of the Corporation	Lifetime of Institution	Destroy
Directorate	Minutes from Meetings / Committees	Current Academic Year + 50	Destroy
	Staff Disciplinary conducted by Principal & Directors	Closure of case + 6 years	Destroy
	Stored Hard Copy information – Pre 16, High needs, etc	Current Academic Year + 5	Destroy
	Duty Manager	7 Years	Destroy
	External Meetings	Current Academic Year + 5	Destroy

*in accordance with the General Block Exemption Regulation (Commission Regulation (EU) No 651/2014) or De Minimis Regulation (Commission Regulation (EU) No 1407/2013). The Organisation will maintain detailed records with the information and supporting documentation necessary, to establish that all the conditions laid down in the Regulation are fulfilled.