



Ruskin College Oxford

DATA RETENTION POLICY

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Approved: SLT

Last Reviewed: February 2020

Responsibility for Review:

DPO and Data Co-Ordinators

Date of Next Review: February 2023

Related documents:

GDPR Policy, Disciplinary Policy

1.0 Data Retention Policy

1.1 Related, controlled and advisory documents

- GDPR Policy
- Disciplinary Policy
- Data Map
- General Data Protection Regulations

2.0 Introduction

2.1 This policy applies to all parties who store or process personal information within or on behalf of Ruskin College, including all staff. It refers to all data within the schedule regardless of how it is held (i.e. Paper or electronic). Data co-ordinators are expected to monitor their areas against this policy to ensure compliance although all staff have an obligation to understand and adhere to the retention schedules outlined below.

2.2 If in any doubt as to the applicability or meaning of this policy or of the regulation, contact the relevant data co-ordinator or the Data Protection Officer (dataprotection@ruskin.ac.uk)

3.0 Scope

3.1 The scope of this policy covers retention and destruction of information likely to hold personal data for Ruskin College showing time periods for the amount of data retained in order to comply with operational and legal requirements. The data retention schedule is not meant to be an exhaustive list of all college processes but is intended to cover the main areas of data storage containing personal data. The schedule refers to the main copy of any data, if there are duplicate copies these need to be destroyed as soon as they are no longer of immediate operational use. The default position at the end of the time periods stated is the secure deletion or destruction of the record unless stated otherwise. The General Data Protection Regulations provide a framework for data retention and destruction which forms a basis for this policy, consequently this policy should be read in conjunction with the Data Map, GDPR policy and the relevant legal frameworks. Time frames, in the main, are taken from: -

- Legal obligations
- Contractual obligations
- Statutory duties and governmental Guidance
- Disclosure requirements
- The GDPR and associated legislation
- Good practice and archiving

As per the General Data Protection Regulations the College will only hold data for the length of time required to meet these obligations and legal frameworks. This policy states specific time

frames based on legislation however it should be noted that in certain circumstances data may need to be kept for longer periods than is stated (i.e. litigation), if this is the case the reasoning for this needs to be clearly recorded and agreed by Senior Management. Email should not be used for storing personal data or college records; if these need to be retained they should be stored in an appropriate filing system relevant to their confidentiality level.

4.0 Definitions

GDPR – Stands for the General Data Protection Regulations. These are an EU wide Regulation governing personal data. The full legislation can be found [here](#).

Data Co-ordinators – The College has designated data co-ordinators who manage various areas of the College. These are mainly heads of departments who will have an overview of the process and data within their department; in liaison with the Data Protection Officer they keep the use of data within their departments within legal guidelines.

Data Protection Officer (DPO) – Is a designated person within the College and is the contact point for enquiries/enacting your rights under the legislation. They advise the College on compliance with the legislation. The role of the DPO can be seen [here](#).

5.0 Procedure

5.1 Schedule

	Basic File Description	Retention Period	Action Required
1. Ruskin College Processes			
1.1 Human Resources	Applications for jobs	6 years after employee leaves or 12 months for recruitment data	Permanently delete electronic record - confidentially shred any paper records
	Equality and Diversity monitoring	Rudimentary record kept indefinitely	
	New starter	7 years after employee leaves	Permanently delete electronic record - confidentially shred any paper records
	DBS checks	Renewed every 3 years	Permanently delete
	Ongoing HR Data	Archived when staff member leaves	Permanently delete electronic - confidentially shred paper - If archive needed store data on secure server
	External Training	Archived when staff member leaves	Permanently delete electronic - confidentially shred paper - If archive needed store data on secure server
	Leaving the college	Right to work held for 18 months after	Permanently delete electronic -

		employee leaves	confidentially shred paper.
	Holiday Bookings	Duration of Employment	Permanently delete electronic - confidentially shred paper.
	Non Holiday absence	Duration of employment	Permanently delete electronic - confidentially shred paper.
	Disciplinary Action	Sanctions remain on file for period of the sanction which could be 6 or 9 months, A basic log of related sanctions is maintained for safeguarding purposes indefinitely.	Permanently delete electronic - confidentially shred paper. - Basic log kept on secure server
	Grievances	Remain on file for related period (6-9 months), if appropriate could be added to the basic log.	Permanently delete electronic - confidentially shred paper.
1.2 Learning Resources	Library Loan Accounts	After member leaves and has returned all items	Permanently delete account once items returned and confirmation received that natural person has left organisation
	Active Directory User Accounts	Retained until notified of user leaving then archived	Permanently delete data
	VLE Accounts	Duration of	Permanently delete

		study/employment once notified of leaver	data
	Printing Accounts	Duration of study/employment once notified of leaver	Permanently delete data
	Email Contacts	Duration of study/employment once notified of leaver	Permanently delete data – Archive option if deemed appropriate
	Student Presentations	Current year plus 6 years	Permanently delete data
	Recordings/pictures - external Speakers/conferences/events i.e. opening of Callaghan library/ graduation	For Marketing Purposes 2 years assuming signed consent form. Archival option for preservation purposes after this period.	Either archive is deemed relevant otherwise Permanently delete or requires additional consent
	Hustings - Students Union	Current year plus 6 years	Permanently delete data/ confidential shred paper copies.
1.3 Governance	Record keeping of board membership	Minutes held indefinitely The remainder of the information remove when they leave their post	Minutes to be held confidentially on server - the rest to be permanently deleted
1.4 Finance	Payroll new starter permanent	7 Years from termination of contract	Permanently delete data/ confidential shred paper copies.
	Payroll new starter VT	5 years after becoming inactive	Permanently delete data/ confidential shred paper copies.
	Payroll new starter casual	5 years after	Permanently delete

	non-teaching	becoming inactive	data/ confidential shred paper copies.
	Payroll new starter – fixed term contract	7 years from termination of contract	Permanently delete data/ confidential shred paper copies.
	Monthly Payroll – internal	7 years from termination of contract	Permanently delete data/ confidential shred paper copies.
	Monthly Payroll – external	7 years from termination of contract	Permanently delete data/ confidential shred paper copies.
	Leaver (permanent/ fixed term)	7 years from termination of contract	Permanently delete data/ confidential shred paper copies.
	Leaver VT/Casual	7 years	Permanently delete data/ confidential shred paper copies.
	Purchase Ledger (direct payments and credit Cards)	7 years	Permanently delete data/ confidential shred paper copies.
	Sales Ledger (direct payments and credit cards) - students rooms	7 years	Permanently delete data/ confidential shred paper copies.
	Sales Ledger (direct payments and credit cards) - Conference and room hire	7 years	Permanently delete data/ confidential shred paper copies.
	sales ledger - businesses	7 years	Permanently delete data/ confidential shred paper copies.
	Sales ledger students course fees (long course and short course)	7 years	Permanently delete data/ confidential shred paper copies.
	Petty Cash	7 years	Permanently delete data/ confidential shred paper copies.

	Audit	7 years	Permanently delete data/ confidential shred paper copies.
	VAT returns	7 years	Permanently delete data/ confidential shred paper copies.
	Staff Expenses	7 years	Permanently delete data/ confidential shred paper copies.
1.5 Facilities	ID Cards	Until member leaves college	Permanently delete once confirmed natural person has left organisation
	CCTV	7 days – automatically deletes after 7 day period	Automatically Permanently deletes imagery
	Allocation of rooms	Only when in residence	Permanently delete electronic record - confidentially shred any paper records
1.6 Quality	Registering HE students with validating bodies (Open University)	Current year plus 6 years	Permanently delete data/ confidential shred paper copies.
	Exam Board Grids	Current year plus 6 years	Permanently delete data/ confidential shred paper copies.
	Registering HE students with validating bodies (Newman)	Current year plus 6 years	Permanently delete data/ confidential shred paper copies.
	National Student Survey	Completion plus 5 years	Permanently delete data/ confidential shred paper copies.
	Destination of Leavers from Higher Education survey	Completion plus 5 years	Permanently delete data/ confidential

	(DLHE) and Graduate Outcomes survey (GOS)		shred paper copies.
	Surveys - Placement reviews	Completion plus 5 years	Permanently delete data/ confidential shred paper copies.
1.7 Learning Development	Student Confidential Information	1 year after student completes course.	Permanently delete data/ confidential shred paper copies.
	Student Information	1 year after student completes course.	Permanently delete data/ confidential shred paper copies.
	Folder in LD drive, titled individual students	1 year after student completes course.	Permanently delete data/ confidential shred paper copies.
	Reports to tutors	1 year after student completes course.	Permanently delete data/ confidential shred paper copies.
1.8 Marketing	Marketing Mailing list	5 years from opt-in – opt out option always available	Either new opt in/ or delete data.
	People registered for guest speaker events	Conclusion of event plus 1 year	Either new opt in/ or delete data.
	People registered for Open Days	1 year unless converted to an enrolment	Either new opt in/ or delete data.
	Alumni list	Life of the institution after member opts in – members can opt out at any point.	
	Enquiry forms	1 years unless converted to an enrolment	Permanently delete data/ confidential shred paper copies.
	IAG records	End of course plus 6 years – or 1 year if not	Permanently delete data/ confidential

		enrolled	shred paper copies.
	Friday Visit Log (open event, similar to open days)	1 year	Permanently delete data/ confidential shred paper copies.
	Outreach Meeting reports	While relationship is ongoing or until opt out is requested	Permanently delete data/ confidential shred paper copies.
	Schools project database	While relationship is ongoing or until opt out is requested	Permanently delete data/ confidential shred paper copies.
	Contact lists, List Tracker & Engagement Logs	5 years from opt-in – opt out option always available	Either new opt in/ or delete data.
	Event Contact Sheets	1 year unless converted to enrolment	Permanently delete data/ confidential shred paper copies.
	Conversion data - Applicants that do or do not accept the offer made of a place	1 year unless converted to enrolment	Permanently delete data/ confidential shred paper copies.
1.9 Student services and MIS	Signing in book	Current academic year plus 1 year	Confidentially shred
	Enquiries	1 year	Permanently delete data/ confidential shred paper copies.
	Applications	3 years	Permanently delete data/ confidential shred paper copies.
	Enrolments	Further Education – 13 years Higher Education – 6 years after end of relationship however transcripts, diploma	Permanently delete data/ confidential shred paper copies - transcripts etc. held on REMS/ secure server

		supplements and certificates 120 years.	
	Interview and Assessment	See above	See above
	FE TUC Enrolment	Minimum 5 years	Permanently delete data/ confidential shred paper copies.
	Bursary FE	5 years	Permanently delete data/ confidential shred paper copies.
	Awarding Body / Exam registrations (FE)	1 year after assessment, unless examples need to be kept for audit purposes (5 years)	Permanently delete data/ confidential shred paper copies.
	Counselling	Duration of Study	Permanently delete data/ confidential shred paper copies.
	Student DSA	Duration of Study	Permanently delete data/ confidential shred paper copies.
	ALS	7 years	Permanently delete data/ confidential shred paper copies.
	Exam Access Arrangements	Duration of Study	Permanently delete data/ confidential shred paper copies.
	Childcare	Duration of study or need	Permanently delete data/ confidential shred paper copies.
	Hardship Fund	7 years	Permanently delete data/ confidential shred paper copies.
	Exam Scripts	FE – Certificates 13 years	Permanently delete data/ confidential shred paper copies -

		HE – 120 years validation body recommendation	transcripts etc held on REMS/ secure server
	Safeguarding	Minimum 10 years then review	Review if date - if no longer needed then permanently delete data/ confidentially shred paper - if needed new time limit to be discussed.
	Tier 4 Visas	Minimum 5 years then review	Permanently delete data/ confidential shred paper copies.
	Mitigating Circumstances/ Extensions and Appeals	Length of study	Permanently delete data/ confidential shred paper copies.
	Complaints	Register (log) indefinitely, full detail 12 months then review	Permanently delete data/ confidential shred paper copies - log to be stored on secure server
	Certificate Claims	HE – 120 years validation body recommendation	Store on secure server/ REMS
	Exam Boards	Current academic year plus 6 years	Permanently delete data/ confidential shred paper copies.

6.0 Outcomes

6.1 Grievance

For internal grievances the College will follow its grievance policies as outlined in the defined policies, available on the college website. If anyone has a grievance that is data protection related please contact the Data Protection Officer or Data Co-ordinator in the first instance.

6.2 Complaints

- Please refer to the colleges published policy, available on the website.

6.3 Liability – Individual and collective

Everyone (including staff, students, external contractors) has responsibility to abide by this policy, regulatory and legal requirements including the General Data Protection Regulations. In most instances the Data Controller holds ultimate responsibility under the regulation however individuals could be held personally liable for data protection breaches by the Information Commissioners Office. As stated, internal issues will be dealt with through the grievance and complaints procedures.