

DATA RETENTION POLICY

This policy has been created in accordance with the Data Protection Act 2018 (General Data Protection Regulation) and good practice advice from the National Independent Bursars Association. This policy provides minimum retention periods for all data held or managed by the college, some of which may be personal data.

Data Retention Periods:

Data Area	Record	Retention Period
COLLEGE-SPECIFIC RECORDS	Registration documents of College	Permanent
	Attendance Register	6 years from last date of entry, then archive.
	Minutes of Governors' meetings	6 years from date of meeting
	Annual curriculum	From end of year: 3 years (or 1 year for other class records: e.g. marks / timetables / assignments)
INDIVIDUAL STUDENT RECORDS	Admissions: application forms, assessments, records of decisions	25 years from date of birth (or, if student not admitted, no longer than 1 year from that decision).
	Examination results (external or internal)	7 years from student leaving college
	Student file including: <ul style="list-style-type: none"> • Student reports • Student performance records • Student medical records 	ALL: 25 years from date of birth (<u>subject to where relevant to safeguarding considerations: any material which may be relevant to potential claims should be kept for the lifetime of the student</u>).
	Special educational needs records (to be risk assessed individually)	35 years from Date of birth (allowing for special extensions to statutory limitation period)
	SAFEGUARDING	Policies and procedures (including audits)
	DBS disclosure certificates (if held)	12 months from decision on recruitment, unless DBS specifically consulted – but a record of the checks being made must be kept, if not the certificate itself.

	Accident / Incident reporting	Indefinitely (as recommend by the Goddard inquiry)
	Child Protection files	Indefinitely (as recommend by the Goddard inquiry)
EMPLOYEE / PERSONNEL RECORDS	Single Central Record of employees	Keep a permanent record of all mandatory checks that have been undertaken (but not DBS certificate itself: 6 months as above)
	Contracts of employment/contract for services/consultancy agreements (self-employed or contracted personal) (offer letters and variation letters)	7 years from effective date of end of contract
	Employee appraisals or reviews	Duration of employment plus 7 years
	Staff personnel file (includes grievances, capability and disciplinary documentation, qualifications, termination documentation, references, training records, parental leave records)	As above, <u>but do not delete any information which may be relevant to historic safeguarding claims.</u>
	Payroll, salary, maternity pay records	6 years
	Pension or other benefit schedule records	Permanent, depending on nature of scheme
	Job application and interview/rejection records (unsuccessful applicants)	Minimum 3 months but no more than 1 year
	Immigration records	4 years
	Health records relating to employees	7 years from end of contract of employment
INSURANCE RECORDS	Insurance policies (will vary – private, public, professional indemnity)	Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim.
ENVIRONMENTAL, HEALTH & DATA	Accidents to children	25 years from birth (longer for safeguarding – see safeguarding)
	Accident at work records (staff)	4 years from date of accident, but review case-by-case where possible
	Staff use of hazardous substances	7 years from end of date of use

	Risk assessments (carried out in respect of above)	7 years from completion of relevant project, incident, event or activity.
	Data protection records documenting processing activity, data breaches	No limit: as long as up-to-date and relevant (as long as no personal data held)

17/01/19