

# East Sussex College Group - Data Retention Policy

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### 1 POLICY

- 1.1 East Sussex College Group (the "**College**") must, in respect of its processing of personal data, comply with the Data Protection Act 2018, the General Data Protection Regulation 2016/679, and related legislation (together, "**Data Protection Laws**").
- 1.2 This Retention Policy should be read in conjunction with the College's Data Protection Policy, which sets out the College's overall approach to data protection matters and sets out the rationale for why a Retention Policy is required for personal data.
- 1.3 The College is under a legal obligation only to keep personal data for as long as the College needs it. Once the College no longer needs personal data, the College must securely delete it. The College recognises that the correct and lawful treatment of data will maintain confidence in the College and will provide for a successful working environment.
- 1.4 This Policy applies to all College employees, consultants, contractors and temporary personnel hired to work on behalf of the College ("**College Personnel**").
- 1.5 All College Personnel with access to personal data must comply with this Retention Policy.
- 1.6 Please read this Retention Policy carefully. All College Personnel must comply with it at all times. If you have any queries regarding this Retention Policy, please consult your manager and/ or the Data Protection Officer. You are advised that any breach of this Retention Policy will be treated seriously and may result in disciplinary action being taken against you.
- 1.7 College Personnel will receive a copy of this Policy when they start and may receive periodic revisions of this Policy. This Policy does not form part of any College Personnel's contract of employment and the College reserves the right to change this Policy at any time. All College Personnel are obliged to comply with this Policy at all times.

### 2 ABOUT THIS POLICY

This Retention Policy explains how the College 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 College's policies for the retention of Special Category personal data.

### 3 DATA RETENTION PERIODS

- 3.1 The College has assessed the types of personal data that the College holds and the purposes the College use it for. The table below sets out the retention periods that the College has set for the different departments within the College, and the different types of data that they each hold.

- 3.2 If any member of College Personnel 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.

#### 4 RETENTION PERIODS FOR DIFFERENT CATEGORIES OF DATA

Record	To be Maintained by	Period of Retention	Location of Records
Customer Comments, College Surveys	Quality	5 Years	Office/Archive
Financial Records (all records including invoices, receipts as well as copies of ledgers and accounts - electronic and hardcopy)	Finance	7 Years	Office/Archive
Minutes of the Board of the Corporation and its committees	Clerk to the Corporation	Historical records never be disposed of	Office/Archive
Agenda, papers and other records of the Board of the Corporation	Clerk to the Corporation	10 Years	Office
Internal and External Audit	Finance	7 Years	Office
Tenders and Time-expired Contracts	Finance	7 Years	Office/Archive
Employers Liability Certificate	Finance	20 Years	Office
Data Protection Registration	MIS	10 Years	Office
Student MIS Records (all records - electronic and hardcopy)	MIS	7 Years	Office/Archive
Exam and Assessment Records + correspondence with examination bodies	Exams	5 Years	Office/Archive
Software Licences and Hardware Registers	IT Services	5 Years	Office/Archive
Confidential Student Counselling Records	College Counsellors	2 Years or as required under Counselling guidelines	Office
Internal Quality Audit Files	Quality	5 Years	Office/Archive
Staff Professional Development Records and Files	HR	5 Years	Office/Archive
Accident Register	Health & Safety Manager	7 Years	Office
Health and Safety Records (including risk assessment, audits, PAT testing records, tests and inspection records)	Health & Safety Manager	10 Years	Office/Archive
Staff Personal Files	HR	Duration of individual's employment, then archived for 10 years	Office/Archive
Recruitment Files	HR	4 months from the date of decision	Office/Archive
Student Files	Faculty Administrators	5 Years	Office/Archive
Course Files	Course Teams	5 Years	Office/Archive

<b>Record</b>	<b>To be Maintained by</b>	<b>Period of Retention</b>	<b>Location of Records</b>
Student Examination Scripts	Exams	5 Years	Office/Archive
Library Statistics	LRC/Library Manager	5 Years	Office
Staff Timetables	Curriculum Heads	2 Years	Office/Archive
Student Services: - <ul style="list-style-type: none"> <li>• Student Counselling</li> <li>• Advice and Guidance</li> <li>• Bursary/dLSF</li> <li>• Education Maintenance Allowance (EMA)</li> <li>• Access Fund</li> <li>• Childcare</li> </ul>	Head of Student Services	Duration of Student's enrolment with the College, then archived for 3 years	Office/Archive
Payroll Data	HR	Duration of individual's employment, then archived for 10 years	Office/Archive
Line Manager's Staff Files and records relating to staff (e.g. PDR, staff development, file notes)	All Line Managers	Duration of individual's employment, then forwarded to HR for disposal	Office
Data used for ESF match/ESF Contracts	MIS	Variable dependent upon ESF project. Current contractual requirements are to retain until 31 December 2022	Office/Archive

## 5 CHANGES TO THIS POLICY

The College reserves the right to change this schedule at any time.