

# Data Retention Policy 2023-2025



## Change log

Version number	Changes description	Major changes? Y/N	Initiator	Rationale	Date of completion	New version number

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## 1. INTRODUCTION

1.1. The **Data Protection Act 2018** (DPA 2018) is an **act** of the United Kingdom (UK) Parliament defining the ways in which information about living people may be legally used and handled. The main intent is to protect individuals against misuse or abuse of information about them and to make provision for the regulation of the processing of information relating to individuals; to make provision in connection with the Information

Commissioner's functions under certain regulations relating to information and ensure processing of personal data is subject to **GDPR** (General Data Protection Regulation).

The policy covers all staff, students and all key stakeholders at **Hopwood Hall College**.

Hopwood Hall College is required to comply with the Act in relation to its processing of personal data. Processing has a broad definition and includes obtaining, recording, holding, using, disclosing and destroying personal data.

## 2. SCOPE

- 2.1 Hopwood Hall College (the "**College**") must, in respect of its processing of personal data, comply with the Data Protection Act 2018 and related legislation.
- 2.2 This 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.
- 2.3 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.
- 2.4. This Policy applies to all College employees, consultants, contractors and temporary personnel hired to work on behalf of the College ("**College Personnel**").
- 2.5. All College Personnel with access to personal data must comply with this Policy.
- 2.6. Please read this 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.
- 2.7. 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.

### 3. AIM

3.1 This 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 personal data.

### 4. DATA RETENTION PERIODS

4.1 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 (particular pieces of personal data may be held for shorter/longer periods and this information can be obtained from the Data Protection Officer).

4.2 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.

#### RETENTION PERIODS FOR DIFFERENT CATEGORIES OF DATA

Ref:	Type of data	When will the College delete it?	When will the College delete it?
1	CCTV Security	30 days	Manual deletion /file maintenance
2	Commercial enterprise	Current Client	Manual deletion /file maintenance
3	Complaints and compliments	Current year plus 6	Manual deletion /file maintenance
4	Data Protection/FOI	Current year plus 6	Manual deletion /file maintenance
5	DBS	12 Months	Manual deletion /file maintenance
6	Email Correspondence	Current year plus 1	Manual deletion /file maintenance
7	Financial transactions	Current year plus 6	Manual deletion /file maintenance

8	Governor Details	Current year plus 6	Manual deletion maintenance	/file
9	Health & Safety	Current year plus 40	Manual deletion maintenance	/file
10	Insurance Claims	Current year plus 40	Manual deletion maintenance	/file
11	Library records	Current year	Manual deletion maintenance	/file
12	Occupational Health	Current year plus 40	Manual deletion maintenance	/file
13	Payroll	Current year plus 6	Manual deletion maintenance	/file
14	Pension records	Current year plus 75	Manual deletion maintenance	/file
15	Personnel file	Current year plus 6	Manual deletion maintenance	/file
16	Professional Development	Current year plus 2	Manual deletion maintenance	/file
17	Reception	Current year	Manual deletion maintenance	/file
18	Recruitment - successful	Current year plus 6	Manual deletion maintenance	/file
19	Recruitment - unsuccessful	12 Months	Auto 12 month deletion	
20	Student Applications	Current year plus 2	Manual deletion maintenance	/file
21	Student Enrolment Details	Current year plus 6 (ESF until 2030)	Manual deletion maintenance	/file
22	Student Safeguarding Records	Current year plus 6	Manual deletion maintenance	/file
23	Student tracking	Current year plus 2	Manual deletion maintenance	/file
24	Corporation Meeting Minutes	Current year plus 6	Manual deletion	
25	Website marketing	Current year plus 1	Manual deletion maintenance	/file

## 5. CHANGES TO THIS POLICY

- 5.1 The College reserves the right to change this policy at any time in accordance with both internal College procedures and changes to Data Protection laws.

## 6. EVALUATION

- 6.1 Policy Date: 1<sup>st</sup> March 2023  
Version: 1.0  
Equality Impact assessment completed: Yes  
EIA Date: 7<sup>th</sup> February 2023  
Completed By: Matthew Taylor  
Policy Review Date: 1<sup>st</sup> March 2025

