

AWARD-WINNING EDUCATION

HOPWOOD HALL COLLEGE  
**Data Retention  
Policy**

**2024-2025**



## Policy Cover Sheet

Please fill in the following details:

Policy Name	Data Retention Policy
Version Number	V1.1
Policy Owner	Matthew Taylor
Release Date	08/11/2024
Policy valid for	1 year / 2 years / 3 years

Documents included:

Completed Checklist (below)	x
Policy text	x
Filled in EIA	x

Where should this policy be shared? All policies will be shared on the HUB.

The HUB	x
Net Consent	
Website	

### Policy Checklist

Have you completed the following tasks:

Used the Microsoft Accessibility Checker	x
Used formatted headings	x
Used Arial 12pt font	x
Included numbered paragraphs	x
Included page numbers	x
Included alternative text for all images which accurately describe what's in the picture	N/A
Checked for gender neutral language e.g. remove dinner ladies, workmen, he/she and replaced with servers, contractors, they.	x
Used the full phrase instead of the acronym at least the first time	x
Used the spelling and grammar check	x
Gained feedback from colleagues to ensure the policy is clear and accurate	x
Included any legal, social, or organisational changes since the last policy review	N/A
Reviewed the connected policies to ensure they are still active	x
Filled in the change log	X
Listened to the policy using the accessible reader	X
Reviewed the policy flowchart	X
Informed the EDI Manager of upcoming policy deadlines	

**Sign Off: To be filled in by the named person only.**

	Name	Date
SLT		
Corporation (if required)		
Trade Union		
EIA		

## Change log

Version number	Changes description	Major changes? Y/N	Initiator	Rationale	Date of completion	New version number
1.0	New layout	N	Matthew Taylor		05/11/2024	1.1

## CONTENTS

1. INTRODUCTION .....	4
2. SCOPE .....	4
3. AIM .....	5
4. ROLES AND RESPONSIBILITIES .....	5
5. PROCEDURE.....	5
7. DOCUMENTS ASSOCIATED WITH THIS POLICY .....	8
8. APPENDIX .....	8

## 1. INTRODUCTION

- 1.1. This section should be a summary of the aims of the policy.
- 1.2. 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.
- 1.3. Commissioner's functions under certain regulations relating to information and ensure processing of personal data is subject to **GDPR** (General Data Protection Regulation).
- 1.4. The policy covers all staff, students, and all key stakeholders **at Hopwood Hall College**.
- 1.5. 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**") and third-party contractors.

2.5. 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, Ross Black [DPO@hopwood.ac.uk](mailto:DPO@hopwood.ac.uk)

2.6. 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. ROLES AND RESPONSIBILITIES

4.1. All staff in the departments listed below are responsible for ensuring the retention and deletion of data in a timely manner:

- Admissions and Enrollment
- Business Support Staff
- Finance
- Human Resources (HR)
- Facilities

### 5. PROCEDURE

5.1. 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).

5.2. 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.

Ref	Type of data	Purpose	Retention period	Method of Deletion
<b>Admissions</b>				
A1.1	Student applications for candidates applying to enrol.	Information to enable recruitment	For those who do not enrol: end of admissions process plus 2 years. For those who do enrol: end of student programme plus 6 years.	Auto deletion procedure
<b>Enrolment</b>				
E1.1	Student enrolment	Information for funding validation, quality assurance and performance monitoring	Current year +6	Auto deletion
E1.2	Student bursary	Information on bursary and payments	Current year +2	Manual deletion
E1.3	Student Safeguarding Records	Information to support safeguarding processes	Current year +6	Auto deletion
E1.4	Student tracking and monitoring	ILP, Markbook and progress monitoring information to track	Current year + 2	Auto deletion

		and monitor student progress		
E1.5	Exam results and outcomes	Course outcomes to track, monitor and report course outcomes	Current year +6	Auto deletion
<b>Finance</b>				
F1.1	Financial transactions	Purchase orders, Invoices and financial transactions	Current year +6	Auto deletion
F1.2	Insurance Claims	Details of claims	Current year +40	Manual deletion
F1.3	Commercial enterprise	Details of current customer clients using commercial services	Current year +1	Manual deletion
<b>HR</b>				
H1.1	Personnel file	Staff information	Current year +6	Auto deletion
H1.2	Professional Development	Information on staff CPD	Current year +6	Manual deletion
H1.3	Recruitment	Information on candidates applying to college for employment	Successful recruitment current year +6. Unsuccessful recruitment 1 year	Auto deletion
H1.4	DBS	DBS records for safer recruitment	1 year	Manual deletion
H1.5	Occupational Health	OH records for confidential personnel file	Current year +40	Manual deletion
H1.6	Payroll	Information to process staff payroll	Current year +6	Auto deletion
H1.7	Pension records	Information to process staff pension	Current year +75	Auto deletion
H1.8	Governor records	Information on Governing body members personnel file	Current year +6	Auto deletion
<b>Business Support</b>				
S1.1	Complaints and compliments	Information on registered complaints and compliments	Current year +6	Auto deletion
S1.2	Data Protection/FOI	Information on registered logs and breaches	Current year +6	Manual deletion

S1.3	Email Correspondence	Business communications	Current year +3	Manual deletion
S1.4	Library records	Information on Library users	Current year	Auto deletion
S1.5	Corporation Meeting Minutes	Meeting agendas and minutes	Current year +6	Manual deletion
S1.6	Website marketing	Logs of website interactions and enquiries	Current year +1	Auto deletion
<b>Facilities</b>				
T1.1	CCTV Security	Footage from CCTV camera system	30 days	Auto deletion
T1.2	Visitor registration	Information of visitor's registration	1 year	Auto deletion
T1.3	Health & Safety	Information on reported incidents	Current year +40	Manual deletion

## 6. MONITORING AND EVALUATION

6.1. 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.

## 7. DOCUMENTS ASSOCIATED WITH THIS POLICY

7.1. [Data Protection Act 2018](#)

7.2. [The UK GDPR](#)

## 8. APPENDIX

8.1. Nonapplicable.