

**Data Retention Policy**

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**Data Retention Policy****1 POLICY**

- 1.1 Shrewsbury Colleges 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 Employees**").
- 1.5 All College Employees with access to personal data must comply with this Retention Policy.
- 1.6 Please read this Retention Policy carefully. All College Employees must comply with it at all times. If you have any queries regarding this Retention Policy, please consult your line 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.
- 1.7 College Employees will be referred to a copy of this Policy when they start, as part of their College Induction, and may receive periodic revisions of this Policy. This Policy does not form part of the contract of employment and the College reserves the right to change this Policy at any time. All College Employees 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 Employees 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.

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

The College will apply a standard data retention period of 6 academic years, including the year of collection, from the final year of engagement with the College. This period is the maximum useful life for datasets to allow historical reporting or to allow the College to 're-activate' a student following a period away from learning.

The College has a number of exceptions to this standard period; they are listed in the table below.

All electronic data is deleted in accordance with Waste Electrical and Electronic (WEEE) Regulations and through secure and auditable means. All manual records are destroyed by a specialist third-party shredding provider on site.

Type of data	When will the College delete it (if manual)?	When will the College delete it (if electronic)
Student ILR data required to support ESF match funding requirements	31 <sup>st</sup> December 2030	31 <sup>st</sup> December 2030
College Employee Human Resource files	60 years following end of contract of employment.	60 years following end of contract of employment.
College Health & Safety Records	12 months, then scanned to electronic copy and original securely destroyed.	60 years from year of creation.
Records of disclosed student criminal convictions; including any decision to enrol to a course	31 <sup>st</sup> October in the academic year following end of course.	31 <sup>st</sup> October in the academic year following end of course.
Details of Applicants that did not progress to enrolment	4 academic years, including year of collection.	4 academic years, including year of collection.
Qualitative data stored in pastoral systems, e.g. ProMonitor.	4 academic years, including year of collection.	4 academic years, including year of collection.
Student assignment submissions/work portfolios	3 academic years, including year of collection.	4 academic years, including year of collection.
Student Safeguarding Records	6 academic years, including year of collection.	6 academic years, including year of collection.
Manual Visitors Sign-in Sheets	12 Months	N/A
Data relating to unsuccessful Job Applications	3 years from application date.	3 years from application date.
Recordings of live teaching activities including teacher and student images or voices	N/A	At the end date of the relevant course

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Recordings of teaching activities including only a teacher, used for broadcast purposes in the future.	N/A	Retained for up to 5 academic years to reuse with other students.
Recordings of prospective student interviews	N/A	At the end of the enrolment process; normally 30 <sup>th</sup> Sept in the relevant academic year
Recordings of applicant interviews for employment at the College	N/A	At the conclusion of the appointment process
CCTV Footage	N/A	30 days from the point of recording, unless specifically referenced in a current procedure, e.g. Student Conduct, in which case following the conclusion of that proceeding.

**5 CHANGES TO THIS POLICY**

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