



# Data Retention Policy

Policy Area: General Corporate

Policy Lead: Data Protection Officer

Approval By: Exec

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## 1. Introduction

- 1.1. East Sussex College must, in respect of its processing of personal data, comply with the [Data Protection Act 2018](#), the [General Data Protection Regulation 2016/679](#), as amended by the Data (Use and Access) Act 2025 and related legislation (together, 'Data Protection Laws').
- 1.2. The Data Retention Policy lays out how the college complies with its legal obligation not to keep personal data for longer than needed and defines 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 and processing for compatible purposes, such as research or archiving in the public interest, as permitted under Data Protection Laws.
- 1.3. The college is under a legal obligation only to keep personal data for as long as the college needs it for its specified purposes. Once the college no longer needs personal data, the college must securely delete it. Where data is retained for compatible purposes (e.g., scientific or historical research), appropriate safeguards will be applied. 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. Scope

- 2.1. This policy applies to all college staff members, consultants, contractors and temporary personnel hired to work on behalf of the college.
- 2.2. All college staff with access to personal data including data processed via digital services (e.g., online platforms or Google Drive), must comply with this policy, ensuring additional protections for children's data as required by Data Protection Laws.
- 2.3. This Data 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.
- 2.4. Please read the Data Retention Policy carefully. All college staff must comply with it at all times. If you have any queries regarding this policy, including processing children's data or data for research purposes, please consult your manager and/or the [Data Protection Officer](#).

## 3. Data retention periods

- 3.1. The college has assessed the types of personal data that it holds and the purposes for which it is used. The table in Section 4 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. Where personal data is retained for compatible purposes, such as scientific or historical research, public security, or archiving in the public interest as permitted under Data Protection Laws, the Data Protection Officer must be consulted to ensure appropriate safeguards (e.g., data minimisation or pseudonymisation) are applied. For automated decision-making involving personal data, including special category data, human intervention options will be provided unless an exemption applies.
- 3.3. If any member of college staff 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, or is to be used for a compatible purpose, please contact the [Data Protection Officer](#) for guidance.

#### 4. Retention periods for different categories of data

| Record   | Owner                          | Period of retention   | Location              |
|--|--------------------------------|---|-----------------------|
| Customer comments, college surveys, testimonials   | Quality                        | 5 years   | Office/<br>archive    |
| Financial records (all records including invoices, receipts as well as copies of ledgers and accounts - electronic and hardcopy) | Finance                        | 7 years   | Office/<br>archive    |
| Minutes of the Governing Board and its committees  | Director of Governance         | Historical records, never disposed of                           | Office/<br>archive    |
| Agenda, papers and other records of the Governing Board  | Director of Governance         | 10 years  | Office                |
| Internal and external audit  | Finance                        | 7 years   | Office                |
| Tenders and time-expired contracts   | Finance                        | 7 years   | Office/<br>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/<br>archive    |
| Door Swipe Data  | IT                             | 2 years   | Office/<br>electronic |
| Exam and assessment records & correspondence with examination bodies   | Exams                          | 5 years   | Office/<br>archive    |
| Software licences and hardware registers   | IT Services                    | 5 years   | Office/<br>archive    |
| Confidential student counselling records   | College Counsellors            | 2 years or as required under Counselling guidelines             | Office                |
| Internal quality audit files   | Quality                        | 5 years   | Office/<br>archive    |
| Staff professional development records and files   | People Services                | 5 years   | Office/<br>archive    |
| ID documents used for DBS  | People Services/<br>Curriculum | As soon as the individual leaves                                | Office/<br>archive    |
| ID documents used for Right to Work Status   | People Services/<br>Curriculum | Duration of individual's employment, then archived for 2 years  | Office/<br>archive    |
| Health & Safety - 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/<br>archive    |
| Staff personal files   | People Services                | Duration of individual's employment, then archived for 10 years | Office/<br>archive    |
| Recruitment files  | People Services                | 4 months from the date of decision                              | Office/<br>archive    |
| Student files  | Faculty administrators         | 5 years   | Office/<br>archive    |
| Course files   | Course teams                   | 5 years   | Office/<br>archive    |
| Student examination scripts  | Exams                          | 5 years   | Office/<br>archive    |

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| Record  | Owner                        | Period of retention  | Location                          |
|---|------------------------------|--|-----------------------------------|
| Library statistics  | LRC/library manager          | 5 years  | Office                            |
| Staff timetables  | Curriculum heads             | 2 years  | Office/<br>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> | Director of Student Services | Duration of student's enrolment with the college, then archived for 3 years  | Office/<br>Archive                |
| Payroll data  | People Services              | Duration of individual's employment, then archived for 10 years  | Office/<br>archive                |
| Line manager's staff files and records relating to staff (e.g. staff development, file notes)   | All line managers            | Duration of individual's employment, then forwarded to People Services for disposal  | Office                            |
| Data used for ESF match/ESF contracts   | ESF project team             | ESF documents will be kept for at least 10 years after the final claim is paid   | Office/<br>archive/<br>electronic |
| CCTV footage  | Facilities                   | 31 days  | Facilities office                 |
| Recordings of IAG meetings via Google Meet  | Student Services/<br>Careers | 30 days  | ESC<br>Google Drive               |
| Access Control Logs   | Facilities                   | 7 years  | Facilities office                 |
| Car registration for parking at Station Plaza (Parking-Eye)   | Facilities                   | 3 years or until employment ceases   | Facilities office                 |
| Driver tracking on college vehicles   | Facilities                   | 12 months  | Facilities office                 |
| <b>ESF Contracts</b>  |                              |  |                                   |
| ESIF 2014-2020 contract - Starting Sept 2020  | MIS/ ESF Project Team        | 31 July 2032   | Office/<br>archive/<br>electronic |
| ESF Project:<br>East Sussex Industry Development Team<br><br>Project Number: 30S20P04250  | ESF Project Team             | 10 years after the final claim is paid.<br><i>NB: Grant recipient must check with the Managing Authority before disposing of records</i> | Office/<br>archive/<br>electronic |

## 5. Disposal of data

- 5.1. East Sussex College will ensure that all documents /files containing personal data are destroyed in a secure manner to prevent unauthorised access. For example:
- Use of shredding to destroy documents. If a 3rd party service is used (e.g. Shred-It) they must be checked for GDPR compliance
  - Use of industry standard formatting /secure wiping tools to remove all data from hard disk drives