



# Data Retention Policy

**Policy Area:** General Corporate

---

**Policy Lead:** Director of MIS & Digital

---

**Approval By:** Executive

---

**Date of Approval:** February 2024

## Contents

1.	Introduction.....	2
2.	Scope .....	2
3.	Data retention periods .....	2
4.	Retention periods for different categories of data .....	2
5.	Disposal of data .....	4

## 1. Introduction

- 1.1. East Sussex College Group 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. 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.
- 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.

## 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 must comply with this Retention Policy.
- 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, 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. 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, 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/ 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 Governing Board and its committees	Director of Governance	Historical records never be disposed of	Office/ 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/

## DATA RETENTION POLICY

Record	Owner	Period of retention	Location
			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	People Services	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	People Services	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
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	People Services	Duration of individual's	Office/ archive

## DATA RETENTION POLICY

Record	Owner	Period of retention	Location
		employment, then archived for 10 years	
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/ archive/ Electronically
CCTV footage	Facilities	30 days	Facilities office
Recordings of IAG meetings via Google Meet	Student Services/ Careers	30 days	ESCG Google Drive
Access Control Logs	Facilities	7 years	Facilities office
Car registration for parking at Station Plaza (ParkingEye)	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/ Archive/ Electronically
ESF Project: East Sussex Industry Development Team  Project Number: 30S20P04250	ESF Project Team	10 years after the final claim is paid. Note: Grant recipient must check with the Managing Authority before disposing of records	Office/ Archive/ Electronically

## 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:
  - 5.1.1. Use of shredding to destroy documents. If a 3<sup>rd</sup> party service is used (for e.g. Shred-It) – the service must be checked for GDPR compliance.
  - 5.1.2. Use of industry standard formatting /secure wiping tools to remove all data from Hard Disk drives.