Data Retention Policy

Version No	Purpose/Change	Lead	Review Date
1.0	Introduction of policy	KAA	Nov 2018
2.0	Reviewed and updated	KAA	Nov 2019
-	Reviewed – no changes	NES	Nov 2020
-	Reviewed – no changes	SDE	Mar 2022

GDPR requires that personal data should not be kept for longer than is necessary. This policy aims to set out the Wilberforce College's data retention periods that need to be adhered to by all members of staff.

Once personal data is no longer needed, it should be securely deleted/destroyed in accordance with the retention period set. Colleges need to be wary of information not stored on central systems, e.g. where teachers or managers keep their own paper files. Personal data needs to be destroyed securely and all different types of media on which the data is stored need to be considered.

1 POLICY

1.1 Wilberforce College] (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 Personnel**").

1.5 All College Personnel with access to personal data must comply with this Retention Policy.

1.6 Please read this Retention 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.

1.7 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.

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 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.

4 RETENTION PERIODS FOR DIFFERENT CATEGORIES OF DATA

Category	**Type of data**	**When will the College delete it?**	**Responsibility for deleting it (if paper)?**	**Responsibility for deleting it (if electronic)?**
Student Applicant	Personal information (such as name, address, tel nos, ULN)	1 year after the end date of the academic year in which they apply	Marketing	MIS Marketing
Student Applicant	Personal characteristics (such as ethnicity, language, nationality, country of birth, gender, free school meal eligibility)	1 year after the end date of the academic year in which they apply	Marketing	MIS Marketing
Student Applicant	Special educational needs information	1 year after the end date of the academic year in which they apply	Marketing Study Support	MIS
Student Applicant	Safeguarding information	7 years after the end date of the academic year in which they apply	Marketing Student Services	MIS
Student Applicant	School behavioural and performance information	1 year after the end date of the academic year in which they apply	Marketing Student Services Study Support	MIS
Student	Personal information (such as name, address, tel nos, ULN)	7 years from the end of the academic year in which the student completes their studies or until 31 December 2030 if student comes under	Student Services	MIS

Category	Type of data	When will the College delete it?	Responsibility for deleting it (if paper)?	Responsibility for deleting it (if electronic)?
		Adult Education Budget		
Student	Personal characteristics (such as ethnicity, language, nationality, country of birth, gender, free school meal eligibility)	7 years from the end of the academic year in which the student completes their studies or until 31 December 2030 if student comes under Adult Education Budget	Student Services	MIS
Student	UCAS references	7 years from the end of the academic year in which the student completes their studies or until 31 December 2030 if student comes under Adult Education Budget	Student Services	MIS
Student	Assessment and attendance data	7 years from the end of the academic year in which the student completes their studies or until 31 December 2030 if student comes under Adult Education Budget	Student Services	MIS
Student	Medical information	7 years from the end of the academic year in which the student completes their studies or until 31 December 2030 if student comes under Adult Education Budget	Student Services Employer engagement	MIS
Student	Work experience information	7 years from the end of the academic year in which the student completes their studies or until 31 December 2030 if student comes under Adult Education Budget	Student Services Employer engagement	MIS
Student	Special educational needs information	35 years from the end of the academic year in which the student completes their studies	Student Services Study Support	MIS

Category	Type of data	When will the College delete it?	Responsibility for deleting it (if paper)?	Responsibility for deleting it (if electronic)?
Student	Safeguarding information	35 years from the end of the academic year in which the student completes their studies	Student Services	MIS
Student	Pre-16 school behavioural and performance information	1 year from the end of the academic year in which the student completes their studies	Student Services	MIS
Student	Bank account details	At the end of each academic year	Finance	MIS
Student	Car/bike details	At the end of each academic year	n/a	Student Services
Student	Biometrics	At the end of each academic year	n/a	Student Services
Student	ID Photos	1 year from the end of the academic year in which the student completes their studies	n/a	MIS
Student funded using ESF funding	All information	Until 2030	Student Services/MIS	MIS
Parent	Personal information (such as name, address, tel nos)	1 year from the end of the academic year in which their son/daughter completes their studies	Student Services	MIS
Parent	Personal characteristics	1 year from the end of the academic year in which their son/daughter completes their studies	Student Services	MIS
Parent	Safeguarding information	35 years from the end of the academic year in which their son/daughter completes their studies	Student Services	MIS
Staff Applicant	Personal information (such as name, address, tel nos)	1 year after the end date of the academic year in which they apply	HR	HR
Staff Applicant	Personal characteristics (such as ethnicity, language, nationality, country of birth, gender)	1 year after the end date of the academic year in which they apply	HR	HR

Category	Type of data	When will the College delete it?	Responsibility for deleting it (if paper)?	Responsibility for deleting it (if electronic)?
Staff Applicant	School behavioural, attendance and performance information	1 year after the end date of the academic year in which they apply	HR	HR
Staff Applicant	Medical information	1 year after the end date of the academic year in which they apply	HR	HR
Staff Applicant	Candidate selection information (such as interview notes, tasks etc)	1 year after the end date of the academic year in which they apply	HR	HR
Staff Applicant	Reference details	1 year after the end date of the academic year in which they apply	HR	HR
Staff	Employment records	15 years after the end date of the academic year in which they complete their employment	HR	HR
Staff	Performance Management Reviews and Legal requirements (Single Central Register)	15 years after the end date of the academic year in which they complete their employment	HR	HR
Staff	Safeguarding information	35 years after the end date of the academic year in which they complete their employment	HR	HR
Staff	Bank Account	at the end date of the academic year in which they complete their employment	HR	HR
Staff	Next of kin	at the end date of the academic year in which they complete their employment	HR	HR
Staff	ID Photo	at the end date of the academic year in which they complete their employment	HR	HR
Staff	Payroll: staff address, email, tel no & Bank details	Until the end of the academic year in which they complete their employment	HR	HR
Staff	Payroll: other information not detailed above	15 years after the end date of the academic year in which they complete their employment	HR	HR

Category	Type of data	When will the College delete it?	Responsibility for deleting it (if paper)?	Responsibility for deleting it (if electronic)?
Staff	Financial records	Min of 6 years after the end date of the academic year in which they complete their employment	HR	HR
Governor	Personal information (such as name, address, tel nos)	Min of 6 years after the end date of the academic year in which they complete their term as a Governor	Clerk to the Corporation	Clerk to the Corporation
Governor	Personal characteristics (such as ethnicity, language, nationality, country of birth, gender)	Min of 6 years after the end date of the academic year in which they complete their term as a Governor	Clerk to the Corporation	Clerk to the Corporation
Governor	Attendance information	3 years after the end date of the academic year in which they complete their term as a Governor	Clerk to the Corporation	Clerk to the Corporation
Governor	Recruitment data	1 year after the end date of the academic year in which they apply	Clerk to the Corporation	Clerk to the Corporation
Governor	Register of interests	Min of 6 years after the end date of the academic year in which they complete their term as a Governor	Clerk to the Corporation	Clerk to the Corporation
Visitors	Name, reason for visit, person visited, signature, photo	1 year after the end of the academic year in which they visited	HR	IT
Visitor	DBS number and date issued	2 years after the end of the academic year in which they visited	-	HR

NB All staff are responsible for ensuring any personal data they may possess (paper or electronic) adheres to this retention schedule.

5 CHANGES TO THIS POLICY

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