

Data Retention and Disposal Policy

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Appendix 1: Data Retention Schedule

Policy Name: Data Retention and Disposal Policy	Policy No: 148001
Approved Date: June 2023	Review Date: June 2025
Approved by: College Leadership Team	EqIA Completed: Yes
Author: Data Protection Officer	Monitoring & Evaluation: College Leadership Team

1. Introduction

- 1.1 A Data Retention Policy forms an essential part of the personal data lifecycle. Data shall be maintained for as long as there is an operational or legal need. The length of time it will be retained will be set out in the Data Retention Schedule below.
- 1.2 This policy addresses the requirements surrounding Data Retention as set out by the GDPR policy and the regulations detailed within and how Petroc meets its obligations to individuals and the law regarding the retention of personal data.

2. Purpose and Scope

- 2.1 This document serves to inform all staff members who process personal data on behalf of Petroc.
- 2.2 The purpose of this policy is to:
- minimise the retention of personal data, which is processed and subsequently retained by Petroc. It should be read in conjunction with the Data Retention Schedule which specifies retention periods for each type of data.
 - ensure that records required for legal and evidential purposes
 - ensure that records are not destroyed prematurely
- 2.3 Petroc needs to do this in order to:
- ensure compliance with the law
 - protect staff and other individuals
 - protect the organisation
- 2.4 This document applies to the retention of personal data, which is processed and subsequently retained by Petroc. It needs to consider the Data Retention Schedule which specifies retention periods for each type of data.
- 2.5 It applies to all staff, students, contractors and temporary employees who hold or process and Petroc records for any purpose and should be applied in conjunction with:
- Data Protection Policy
 - Freedom of Information Policy
 - Equality Policy
- 2.6 It applies equally to the college servers, third party servers, email accounts, cloud storage, backup storage such as photographic and digital media that is used to store records as well as more traditional paper based records.

3. General Principles

- 3.1 Personal data shall not be kept for longer than is necessary for a given purpose. However, the retention period can differ based on the type of data processed.
- 3.2 The Data Retention Schedule lists the types of personal data maintained by Petroc and specifies the retention period for each data type. If Petroc acquires a new type of data the retention schedule must be updated.
- 3.3 No records involved in any investigation, litigation or audit will be destroyed until legal counsel has confirmed that no further legal reason exists for retention of the record. It is the responsibility of the Executive management involved to ensure that related documents have been segregated appropriately.

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3.4 All records that are disposed of will be done in accordance with the Data Protection Act with related certificates and records of destruction retained.

3.5 Storage:

3.5.1 A document should not normally be stored on both paper and electronically, nor stored electronically, nor stored electronically in several different locations; a single electronic version (stored so as to be accessible to all who need the information but where there is also need to keep the original for purpose of checking signature or other hand-written details) is the preferred option although one manual hard copy record can be maintained.

3.5.2 There may be some exceptions to this, for example exam related paperwork referring to candidate enrolments results and/or reports.

3.6 Retention Periods

3.6.1 Specific retention periods are detailed in the Data Retention Schedule found at appendix 1 of this document.

3.6.2 Where there is a statutory retention period for a record, this will be treated as a minimum period. No information should be kept indefinitely 'just in case'

3.6.3 In terms of information obligations, data subjects must be informed of the:

- Retention Period
- If no fixed retention period can be provided – the criteria used to determine that period
- Any new retention period if the purposes of processing has changed after personal data has been obtained

4. **Monitoring and Review**

4.1 This policy will be reviewed every two years, but remain subject to review and update when deemed necessary, for example: on receipt of new contracts, projects and funding agreements or changes to related legislation. The retention schedules shall be kept up to date in line with current contracts or other data sharing and retention agreements.

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