

Data Archive Storage and Disposal Policy

The GDPR requires personal Data to be processed and stored in a manner that ensures its security. This includes protection against unauthorised access, unlawful processing and accidental loss. All documents and data must be stored and archived effectively so that they can be easily recalled on request. The Archive Store (TB04) is used to manage hard copies of information that we have a lawful basis or legitimate need to keep for specific purposes. It allows us to keep data secure and ensures that we only keep it for as long as we have a legal right to do so.

Information we keep must be relevant, up to date and easily accessible. The Archive Store must not be used for general storage of other materials, furniture, equipment or student work. In determining the basis for keeping data, a recorded judgment must be made about:

- The legal and legitimate basis for retaining the data
- Current and future value of the information
- Costs, risks and liabilities associated with retaining the information
- Ease or difficulty of making sure it remains accurate and up to date

A Team Member is designated for each area needing secure storage. They will be responsible for the cataloguing, organising and arranging confidential destruction of data for their area, by the agreed date. A named key holder has been identified to act as the accountable gatekeeper for the contents. They will liaise with colleagues in teams with whom they share archive accommodation to ensure compliance

Any information delivered to the Archive Store must be reduced to its most compact form (no binders, plastic sleeves, boxes or bags). It must be stored securely and clearly marked with the following information:

- Designated Team
- Responsible Data Organiser
- Brief Description of Contents
- Date Archived
- Destroy by Date

When considering what you are entitled to store, the following questions help us to comply with the GDPR:

1. Do we have a lawful basis for retaining this information
2. Are there legal or regulatory requirements for retaining this information
3. Does the subject know what information we hold and understand how it will be used
4. Is access to stored personal information strictly limited to those who need to know
5. Is the stored personal data accurate and up to date
6. Do we know when to destroy personal information as soon as there no legitimate need for it
7. Are other team members aware of their duties and responsibilities under the GDPR

Information must not be retained unless there is a legitimate and lawful basis for doing so, and must be securely destroyed if not.

All formal requests for Data Subject Access must be forwarded to the SMT Data Protection Lead, in the first instance, using the College's Data Subject Access Request form.

Retention of Personal Data (Staff and Students) – Archive Storage

Type of Data	Reason for Archiving	Indicative Retention Period
Student Records, including academic achievement and references	To provide personal and academic references Funding Body requirements	Maximum of 6 years with consent of the student
Student Records, including support and conduct records	Limitation period for negligence claims	Maximum of 7 years with consent of the student
Application forms and interview notes	Time limits on litigation Funding Body requirements	At least 30 months from the date of interview
Health Records	Management of the H&S at Work Regulations	During the period of enrolment or employment
Personnel Files including training records and notes of appraisals, disciplinary and grievance hearings	References Potential litigation	6 years from the last day of employment with the consent of the employee
Personnel health records where the reason for the termination of employment is connected with health, including stress related illness	Limitation period for personal injury claims	3 years from the last day of employment
Health Records kept by reason of COSHH Regulations	COSHH 2002	40 Years
Accident books and records of accidents	RIDDOR Regulations 2013	3 years from the date of last entry
Wages and Salary Records	Income Tax Act 2007	5 years
Income Tax and NI returns including correspondence with the Tax Office	Income Tax Act 2007	At least 3 years after the end of the financial year to which the records relate
Statutory Maternity Pay records	Maternity and Parental Leave Regulations 1999	At least 3 years after the end of the financial year to which the records relate
Statutory Sick Pay records	Statutory Sick Pay Regulations	At least 3 years after the end of the financial year to which the records relate
Facts relating to redundancy	Time Limits on Litigation where fewer than 20 redundancies	3 years from the date of redundancy
Facts relating to redundancy	Where fewer than 20 redundancies	Limitation Act 1980
ESF Paperwork and student records	Auditable Documents relating to ESF	7 years after the end of the programme. Current programme retention date is 31/12/30