



Policy Name:	Data Retention Policy
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Approved By:	Audit Committee / Corporation

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1 POLICY

Richmond Upon Thames 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**").

This Retention Policy should be read in conjunction with the College's General 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.

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.

This Policy applies to all College employees, consultants, contractors and temporary personnel hired to work on behalf of the College ("**College Personnel**").

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

This Policy will be provided to all College Personnel. It does not form part of any 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

The College has assessed the types of personal data that the College holds and its purposes. Unless specified below, and where relevant, the College complies with the Jisc guide for FE data retention, a copy of which can be found at <https://www.jisc.ac.uk/full-guide/records-retention-management>. The table below sets out the retention periods that the College has set for exceptions to the Jisc guide. The retention period will depend on the data and the requirements upon it.

In retaining data the following points will be considered:

- the purpose for which the data was obtained;
- whether the purpose has been fulfilled; and
- whether the data needs to be retained for any potential legal claims, or other longer-term purposes (such as pensions, charity law).

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 EXCEPTIONS TO JISC RETENTION PERIODS

This table provides exceptions to the Jisc guide referred to above.

Data type	Retention Period
Human Resources Strategy and Policy Development	Currently 5 years – will retain until compliant with Jisc guide of 10 years
Records documenting the handling of applications for vacancies: unsuccessful applications.	Currently 6 months – will retain until compliant with Jisc guide of 1 year
Industrial Relations Management	Currently 5 years – will retain until compliant with Jisc guide of 20 years
Routine assessments/reviews of the employee's performance, and any consequent action taken.	Appraisals are currently held for 2 years - will retain until compliant with Jisc guide of 3 years
Pension Schemes Administration	TPS and LGPS are administered by those schemes, independently of the College
Records documenting payments of the institution's contributions to pensions schemes.	Only available back to August 2007

5 CHANGES TO THIS POLICY

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