

Data Retention Policy

Designation number	LC043	Title	Data Retention Policy
Current Version number	April 2025 V1	Review date	August 2026
Published on website	Yes	Related policies and/or procedures	Data Protection and Procedure Policy
Relation to QAA requirements (parts of code covered)			
UK Quality Code for Higher Education 2024 - Sector-Agreed Principles			
Principle 4 - Using data to inform and evaluate quality			

1. Introduction

1.1. This Data Retention Policy outlines the standards and retention periods for all personal and institutional data, both paper and electronic, held by the London College (hereafter referred to as “the College”). It supports legal compliance, institutional accountability, and good information governance—especially in relation to academic and administrative functions in the context of higher education provision.

2. Purpose

2.1. The purpose of this policy is to:

- Ensure data is retained for an appropriate duration in line with legal obligations and sector best practice
- Safeguard institutional memory, academic integrity, and transparency
- Minimise the risk of data breaches or unlawful processing by ensuring timely and secure disposal
- Promote accountability in line with higher education sector expectations for quality assurance and governance

3. Scope

3.1. This policy applies to all records and data created, received, or maintained by the College in both electronic and physical form, including:

- Student records (applicants, current, alumni)
- Academic and quality assurance documentation
- Staff records (employment, payroll, appraisals)
- Corporate and financial records
- IT systems and audit logs
- Communications (emails, student feedback, complaints)
- Security and safeguarding information

4. Legal and Regulatory Compliance

4.1. This policy complies with and supports the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Limitation Act 1980
- Equality Act 2010
- Employment Rights Act 1996
- Finance Acts and HMRC guidance
- Education Acts (as relevant to higher education)
- ICO guidance and sector best practice
- Office for Students Supplementary guidance: Retention of assessed work
- JISC Guidance: Business classification scheme (BCS) and records retention schedule (RRS) 2025

4.2. The College is also committed to meeting expectations associated with **academic quality, student outcomes, and institutional governance**, which require careful record retention, especially in areas such as

curriculum delivery, assessment decisions, academic appeals, and student progression.

5. Retention Schedule

Record Type	Retention Period	Rationale
Student core record	60 years	Legal claims under contract law; quality assurance traceability
Student records (enrolment, progression, graduation)	6 years after student leaves	Legal claims under contract law; quality assurance traceability
Award transcripts, degree classifications	Permanently	Verification and alumni services
Admissions (unsuccessful applicants)	1 year	Fair processing; equal opportunities monitoring
Student complaints and appeals	6 years	Legal defence; QA transparency
Disciplinary and conduct records	6 years	Statutory limitation period
Academic committee papers (e.g. boards of examiners, validations)	6 years	Academic governance; curriculum recordkeeping
Teaching materials, assessments	6 years	Internal reference and accreditation
Staff employment records	6 years after leaving	Employment legislation and HR recordkeeping
Recruitment (unsuccessful applicants)	6 months	Good practice under Equality Act
Financial and audit records	6 years	HMRC and financial reporting laws

Record Type	Retention Period	Rationale
Health and safety records	40 years	Statutory health and safety obligations
Safeguarding Children records	Until the individual is 25 or 7 years after last contact	Statutory guidance for safeguarding
Safeguarding Adult records	Last action + 6 years	Statutory guidance for safeguarding
CCTV footage	30 days (unless retained for investigation)	ICO guidance and proportionality principle
Email records	2 years (reviewed annually)	Data minimisation under UK GDPR

Note: Records required to demonstrate course delivery, student achievement, and curriculum content may be held longer if necessary to support verification, accreditation, or legal requirements.

6. Storage and Archiving

6.1. All records must be:

- Held securely to protect against unauthorised access, loss, or damage
- Stored in systems or formats that enable access only by authorised personnel
- Archived (digitally or physically) according to College procedures
- Reviewed regularly to identify records ready for secure destruction

7. Authorising disposal

7.1. Except for temporary materials, before any records are destroyed, the College requires a record of the disposal of any records, including an explanation of both why and when.

8. Recording disposal

8.1. Documenting the disposal of information ensures transparency and accountability, provides evidence of implemented retention policies, and prevents unnecessary searches for non-existent material. Both Freedom of Information and Data Protection legislation require clearly defined procedures, as explanations for the destruction of records may need to be provided in response to information requests. See Appendix A for the London College Records Disposal Form.

9. Secure Disposal

9.1. In accordance with the College Data Protection Policy and Procedure, when records exceed their retention period and are no longer required, they must be securely disposed of:

- **Paper records:** cross-shredded or securely destroyed by a certified provider
- **Electronic records:** permanently deleted using data erasure tools or secure wipe procedures
- **Backup data:** deleted once the retention cycle for those backups ends

10. Delaying disposal

10.1. Where doubt exists regarding the disposal of records, due to pending litigation and investigation, those records will be retained and reviewed at a later date; for any such records, a specific date will be agreed upon and recorded for the review.

10.2. For any records known to be the subject of a request under the Freedom of Information Act or Data Protection legislation, disposal will be delayed until either disclosure occurs, or complaint/appeals procedures are completed.

11. Responsibilities

Role	Responsibilities
Data Protection Officer	Oversees policy implementation and compliance; advises on data retention and security
Senior Management/Heads of Department	Ensure staff follow retention procedures and maintain accurate records
IT Department	Ensure secure systems and data lifecycle support
Registry and Quality Office	Maintain key student, curriculum, and assessment records
All staff	Handle data responsibly and report obsolete records as needed

12. Rights of Individuals

Under the UK GDPR, individuals have the right to:

- Access their personal data
- Request correction or erasure
- Object to or restrict processing
- Request data portability
- Lodge a complaint with the **Information Commissioner's Office (ICO)**

12.1. Requests will be handled in accordance with the College's **Data Protection Policy** and Subject Access Request (SAR) procedure.

13. Review and Maintenance

13.1. This policy will be reviewed **annually** or sooner in the event of:

- Legal or regulatory change
- Significant operational or structural change
- Security incidents or audit findings

- 13.2. Updates will be approved by the College's senior management or governing body.

14. Contact

- 14.1. For any questions about this policy or its implementation, contact:

Data Protection Officer

The London College

Abdirisik Saeed

a.saeed@lcuck.ac.uk

Please see overleaf for The London College Records Disposal Form

Appendix A: The London College Records Disposal Form

The London College Records Disposal Form		
Information/Record Owner (Name and role):		
Authority for disposal (if different from the person above)		
Record title/description:		
Record format (digital/hard copy):		
Reason for disposal:		
Destroyed or moved to archives:	Destroyed <input type="checkbox"/>	Moved to archives <input type="checkbox"/>
How disposed of:	Recycling/standard waste disposal <input type="checkbox"/>	Confidential shredding <input type="checkbox"/>
	Deletion from College digital networks or digital storage <input type="checkbox"/>	Deletion from elsewhere (cloud services or mobile devices) <input type="checkbox"/>
Number of records deleted (approximately):		
Date of disposal/destruction		