

Data Retention Policy

Signing off requirements:

	Date	Author:
Executive	March 2019	Stuart Barlow
Relevant Union(s) Corporation	n/a March 2019	Vice-Principal – Curriculum & Quality
Single Equality Duty Committee (SED)	n/a	

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1 Introduction

Information is one of the College's corporate assets; in the course of carrying out its various functions, the College generates and accumulates information from both individuals and external organisations. The College generates a wide range of data, recorded in documents and records, with these documents and records being stored on the College's IT systems and network infrastructure.

These documents and records are in a range of different formats, examples of which include communications such as letters, emails and attendance notes, financial information including invoices, statements and reports; as well as student records and legal documents such as contracts.

For the purposes of this Policy, the terms 'document' and 'record' include information stored in an electronic form.

In certain circumstances, it will be necessary to retain specific documents in order to fulfil statutory or regulatory requirements and to meet operational needs. Document retention may also be useful to evidence events or agreements in the case of disputes, and to preserve information that has historic value.

It is therefore important that the College have in place systems for the timely and secure disposal of documents and records that are no longer required for business purposes. However, it is equally important that the college does not prematurely dispose of documents and information it is required to retain. The Information Retention Schedule exists to detail the amount of time that the College retains data and information collected from its learners, staff and other individuals whose data is collected and maintained in College systems. Such records and documents and their associated retention periods are documented within the Electronic Data Retention Schedule V1 4.xls spreadsheet (the most recent version is included as Appendix of this document).

Article 5(1)(e) of the GDPR states that "Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed."

Therefore, personal data must not be retained longer than is needed for the purpose for which it was collected. Also, individuals have the right to erasure of their data if it no longer needed, especially where there is not a statutory reason for having collected it, and so the College's Retention Schedule needs to be differentiated in that regard.

Where data reaches the end of its retention schedule, it may be retained in an anonymised manner in order to enable it to be included in statistical analyses. This anonymised data can be retained indefinitely.

The Retention Schedule will be reviewed on an annual basis to ensure that all aspects remain valid.

1.1 Overarching Principles

In order to comply with the ESFA rules on the retention of audit evidence for programmes which are directly or match funded in the ESF 2014-20 round, learner records in the European Social Fund (ESF), Apprenticeships and Adult Education Budget (AEB) funding streams currently must be retained until 31st December 2030.

All other learner records for publicly funded programmes will be retained until 7 years after the end of the academic year pertaining to the records.

This policy covers 3 distinct “types” of data held within Kensington and Chelsea College’s IT systems. These are:

- Information and data relating to students.
- Information and data relating to staff.
- Information and data relating to the College’s core IT systems and infrastructure.

1.2 Data relating to students

All KCC students are data subjects in themselves as well as being producers of their own data. For example, all students will have records held in the college’s student records database. They will also be producing their own data as part of their curriculum and course activities. They will also be making use of a range of college systems and services that will also hold information relating to their access to college related IT services such as Wi-Fi, Library resources, e-learning etc.

1.3 Data relating to staff

Similarly, KCC staff are also data subjects and producers of their own data and also subject to the College’s IT Data Retention policy and the IT data retention schedule.

1.4 Data relating to IT systems and services

The third category is data relating to the colleges IT systems and services, which can be internal or external to the college. These systems are detailed in the attached data retention schedule and cover areas such as user accounts, firewall rules, switch and router configurations and infrastructure management and control systems such as DNS, Active Directory, Wi-Fi management etc.

2 Retention and Disposal Policy

Decisions relating to the retention and disposal of documentation will be taken in accordance with this Policy and in relation to the specific types of information below:-

2.1 Learner Information Retention Schedule

Apprenticeships, AEB learners and ESF beneficiaries

Documentary records and data required by the ILR funding methodology will be retained until 31st December 2030.

Higher Education students, ESFA 16-19 learners and Advanced Learner Loans learners

Documentary records and data required by the ILR funding methodology will be retained for 7 years after the end of the academic year of the funding claim or loan payment.

Non-funded learners

Documentary records and data required by the ILR funding methodology will be retained for 7 years after the end of the academic year of the course.

All learners

The personal data required by the ILR funding methodology previously referred to includes the following data: Name, gender, date of birth, ethnicity, learning difficulties and/or disabilities, National Insurance number, Unique Learner Number, address, country of domicile, telephone number, email address, EHCP, GCSE Maths & English grades, employment status, learner support reason(s), free meals eligibility, and post-College destination.

In the case of Higher Education students only, the following data will also be retained for 7 years for statutory purposes: UCAS Personal Identifier, financial support category, Student Support Number, and socio-economic indicator.

Also required for audit purposes but not included in the ILR are the following data: UCI candidate reference, Additional Learning Support details, qualifications on entry,

Personal data held in Unit-e that is not required in the ILR claims or for statistical purposes will be deleted from the electronic record in the spring term following the academic year that the learner leaves College. This data includes details such as medical details, next of kin details, and the personal photograph.

Personal data held in Unit-e that is not required in the ILR claims but is valuable for statistical purposes will be deleted from the electronic record in the spring term following the academic year that the learner leaves College, with an anonymised data set being retained. This data includes details such as sexual orientation, religious beliefs, previous school, and how they heard about the College.

Check and clear down/deletion of student enrolment records where there are no enrolments, no uncommitted enrolments and the record was created on a date that precedes course setup, will be carried out by MIS in the Spring term of the year to which the record refers.

Check and clear down/deletion of student Additional Learning Support records where there are no enrolments, no uncommitted enrolments and the record was created on a date that precedes course setup, will be carried out by MIS in the Spring term of the year to which the record refers.

Personal data held in eTrackr about learners who have left the College will be retained for the following academic year, and then deleted during the following spring term. This delay is in order to assist staff to respond to any requests for references. Data relating to the Conduct and Performance and Cause for Concern processes will be retained in an anonymised data set after this deletion.

All current year student related paperwork is held in staff-only offices that are locked when the office is unoccupied. Within these offices the paperwork is kept in cabinets which are locked outside working hours. Student and applicant paperwork from previous years is kept in a secure locked facility on the College premises, in boxes marked with their date of destruction. At the end of the period of retention, applicant and student paperwork will be securely destroyed.

2.2 Safeguarding Records

Electronic and paper records relating to safeguarding will be retained as follows:

- Looked after Children records - 75 years from the learner's date of birth
- Adopted children records - 100 years from the date of the adoption order or date adopted
- Child Protection records - 43 years from the record date
- Education records - 25 years from the study programme end

2.3 Applicant Information Retention Schedule

Applicants who convert to enrol at the College

Information and documentation collected during the application phase will become part of the learner file and as such will be subject to the Learner Information Retention Schedule.

Applicants who do not convert to enrol at the College

Applications data will be retained in an anonymised form for use in comparisons and trend analyses outside the Student Records Systems. Applications data in the Student Records Systems will be deleted in the spring term of the academic year applied for, and documentation destroyed at the end of that academic year.

2.4 External Information received into the College

Information on Young People (around year groups 12-14 (and up to 25 years old for YP with LDD) received by the College from Children's Services Department as part of our Information Sharing Operational Agreement, will be stored for a maximum period of 1 year after receipt before being appropriately destroyed by Kensington & Chelsea College

2.5 Staff Information Retention Schedule

See Appendix A

2.6 Finance Information Retention Schedule

All records required for statutory purposes will be securely retained for the statutory minimum period of seven years with the exception of all Apprenticeship, Adult Education and ESF documentation which will be retained until 31 December 2030. At the end of every financial period, a complete trial balance will be produced from the computer system. The trial balance will be retained for seven years for audit verification purposes. Other financial documents will be retained as required by the external and/or internal auditors or the Corporation.

3 Roles and Responsibilities

The Executive Team, and Directors of Service Areas, will be responsible for determining (in accordance with this Policy) whether to retain or dispose of specific records and documents held electronically within the remit of their service area.

Directors of Service Areas may delegate the operational aspect of this function to one or more officers within their service area.

Directors of Service Areas will ensure that the relevant items to their service within the IT Data Retention Schedule V1 4.xls (shown here in Appendix A) are kept up to date.

4 Disposal

It is essential that any documents which are to be disposed of and contain confidential or personal data must be disposed of in a secure manner, shredding of the document being an obvious approach, in order to prevent breaches of confidence, the Data Protection Act 1998, or the General data Protection Regulations

Disposal of documents other than those containing confidential or personal data may be disposed of by binning, recycling, deletion (in the case of electronic documents), and the transfer of documents to external bodies. Records of disposal will be maintained by each service area, and will detail the document disposed of, the date and the officer who authorised the document's disposal.

Appendix A. - IT Data Retention Schedule

Data & Records

Data Type	Repository	Owner	Retention Period	Action	Recovery Expectation	Recovery Period
Course info email inbox	Office 365	IT	30 Days	Microsoft recovery process		
Course Applications	Unit-e	MIS	3 years	Daily backup		
Email	Office 365	User	30 Days from loss/deletion	Microsoft Recovery Process	User only recovery	
Email Mailbox	Office 365	IT	1 Year after end of contract/ departure	Microsoft Recovery Process	Manual restore from recovery folder	8 working hours
Email Logs	Office 365	IT	90 days	No backup	None	n/a
Student Records	Unit E	MIS	7 Years	Daily Backups Arcserve	Full system only from backup	8 working hours
Finance Records	Resource	Finance	7 Years	Daily Backups Arcserve	Full system only from backup	8 working hours
Student Network Accounts	E Directory/Active Directory	IT	90 days after departure	Daily Backups SEP	Manual recreation	8 working hours
Staff Network Accounts	E Directory/Active Directory	IT	Termly	Daily Backups SEP	Manual restore from backup	8 working hours
Student Home Directory	Netware File Server	IT	1 year after departure	Daily Backups SEP	Manual restore from backup	8 working hours
Staff Home Directory	Netware File Server	IT	90 days after end of contract/ departure	Daily Backups SEP	Manual restore from backup	8 working hours
Staff Shared Data	Shared network drives	IT	3 years after last access	Daily Backup SEP. Archive to 2nd tier store	Restore from Archive within 12 months	8 working hours

Library Records	Heritage	LRC	1 year after departure?	Daily Backup SEP	Manual restore from backup	8 working hours
Web Filtering Records	Palo Alto	IT	Month	Weekly Backup	Manual restore from backup	8 working hours
Wi-Fi Account Records	Aero Hive	IT	Academic year	No backup	Manual recreation	8 working hours
E-Learning Student Accounts	Moodle E-Learning	IT	1 year after departure	Daily backup Arcserve	Manual restore from backup	8 working hours
E-Learning Staff Accounts	Moodle E-Learning	IT	1 year after end of contract/ departure	Daily backup Arcserve	Manual restore from backup	8 working hours
IT Helpdesk Records	Webhelp	IT	5 Years	Daily backup Arcserve	Manual restore from backup	8 working hours
HR Records	Bond	HR	10 years	Daily backup Arcserve	Manual restore from backup	8 working hours
Website Enquiries	Website/Intranet	MKTG	Marketing Discretion	Daily backup Arcserve	Manual restore from backup	8 working hours
Staff Document Repository	Shared network drives	Dept.	Useful life of documents	Daily backup SEP	Manual restore from backup	8 working hours
Electronically Published College Strategies	Website/Intranet	Exec	Life of Strategy	Daily backup Arcserve	Manual restore from backup	8 working hours
Electronically Published College Policies	Website/Intranet	Dept.	Life of Policy	Daily backup Arcserve	Manual restore from backup	8 working hours
Electronically Published Procedures	Website/Intranet	Dept.	Life of Procedure	Daily backup Arcserve	Manual restore from backup	8 working hours
Initial Assessment Records	BKSB	Admiss	1 Year After Assessment	Daily backup Arcserve	Manual restore from backup	8 working hours

IT Infrastructure Information

Data Type	Repository	Owner	Retention Period	Action	Recovery Expectation	Recovery Period
Server backups (Virtual)	HP Snapshot	IT	Week	Daily snapshot	Full system only from snapshot	24 working hours
Server backups (Physical)	Arcserve	IT	5 Weeks	Daily backup Arcserve	Full system from tape	24 working hours
Firewall rules	Palo Alto?	IT	Until changed	Backup before and after config changes	Manual restore from backup	8 working hours
Router configs	Cisco	IT	Until changed	Backup before and after config changes	Manual restore from backup	8 working hours
Switch configs	Extreme	IT	Until changed	Backup before and after config changes	Manual restore from backup	8 working hours
DNS	E Directory/Active Directory	IT	Daily	Daily backup SEP	Manual restore from backup	8 working hours
DHCP Scopes	E Directory/Active Directory	IT	Daily	Daily backup SEP	Manual restore from backup	8 working hours
E-Directory	NW E Directory/Active Directory	IT	Daily	Daily backup SEP	Manual restore from backup	8 working hours
Active Directory	MS Active Directory	IT	Daily	Daily backup SEP	Manual restore from backup	8 working hours
Backup Tapes	SEP	IT	1 Month	n/a	n/a	n/a
Backup Tapes	Arcserve	IT	5 Weeks/1 year - end of month	n/a	n/a	n/a