

DATA RETENTION GUIDANCE

PURPOSE

1. The purpose of this document is to provide guidance to all University staff and faculty on best practice in relation to the time period for storing and safely destroying data.

WHAT IS DATA RETENTION

2. **A defined timeline for data destruction** - Financial records – 6 years plus existing tax year.
3. **Applicable to personal data under the Data Protection act 2018** - Name, email, address, date of birth, ethnicity - personally identifiable.
4. **Best practice to consider all data types** - Personal data, Intellectual Property (IP), confidential reports, statistical data.
5. **Definition for personal data is based on law or business justification** - Required for HMRC audits vs required for prospect student email campaigns.
6. **Timeline starts when you finish the processing** - Student leaves, student joins, employee leaves.

BENEFITS OF GOOD DATA MANAGEMENT

7. **Alignment to data privacy law** - Data Protection Act 2018, UK GDPR.
8. **Reduce the risk of data exposure/disclosure** - Incorrect access permissions, data breach.
9. **Reduction in duplication and data inaccuracy** - Paper and digital copies, multiple versions of the same thing.
10. **Reduction in data storage** - Cost and complexity for data storage solutions.
11. **Ease of access** - Collaborate with the correct data, access the data you need when you need it.

BENEFITS OF GOOD DATA MANAGEMENT

The decision behind a data retention period is generally aligned to 1 of 2 things:

12. **A legal justification** - legislation mandates the retention of data for a certain time period
- Financial records, such as salaries paid. HMRC mandate that organisations maintain these records for 6 years plus the year of the last transaction.

13. **Best practice** – defined yourself based on best practice. Some professional association guidance, such as CPID (Chartered Institute of Personal Development) – HR. In all cases the timeline needs to consider:

- a. Purpose for retention
- b. Reasonable expectation of the data subject
- c. Ability to destroy the data at the expiration date.

DATA RETENTION PERIOD JUSTIFICATIONS

Data asset	Retention period	Justification
Employee personnel records	6 months	BEST PRACTICE - To respond to employment tribunals
Student transcript	100 years	BEST PRACTICE – To provide the student with detail son their transcript throughout their lifetime
Supplier invoices	6 years plus tax year	LAW – Aligned to the obligations for audit under HMRC
Student promotional photos/videos	2 years*	BEST PRACTICE – To promote the University
Class training materials (no personal data)	As long as necessary	BEST PRACTICE – Necessity is based on how long the content is useful and needed, maintain freshness
Confidential reports (no personal data)	As long as necessary	BEST PRACTICE – Necessity is based on how long the content is useful and needed, maintain freshness
Student conduct reports	3 years	LAW – Aligned to the limitation act to defend against any legal claims

WHY DIGITAL VS PAPER

14. **Easier to secure** - Digital permissions, password protected systems, data encryption.
15. **Ability to collaborate** - Sharing technologies, based on permissions, multiple contributors.
16. **Fully searchable** - Title and document searching, keywords, Subject Access Requests
17. **Can be edited and updated** - Adding, modifying, deleting data.
18. **Secure destruction** - Digital delete and purge, recoverability.

Paper Assets	Digital Assets
<ul style="list-style-type: none"> Cross shredding 	<ul style="list-style-type: none"> Delete

<ul style="list-style-type: none">• Use of certified destruction services• Destruction based on classification	<ul style="list-style-type: none">• Empty recycle bins• For digital drives – IT will format or enlist the services of a destruction specialist
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