

Data Retention Policy

Policy no:	6.6
Version no.	V 24.11
Next review due:	September 2025
Last review date:	November 2024
Responsible Board:	Corporate and Planning Board
Approved by & date:	SMT April 2023
Linked policies and documents:	Data Protection Policy Policy on Your Rights in Relation to Your Data
External references:	Data Protection Act 2018 General Data Protection Law
	UK Quality Code UKSCQA/02 Advice and Guidance on Monitoring and Evaluation (6.7) Providers take account of ethics and data protection requirements when designing and operating monitoring and evaluation systems.
	ICO No. Z1097339
	optindigo.com for GDPR Consultancy and Support
Audience:	External

Table of Contents

1. Introduction.....	3
2. Purpose.....	3
3. Scope.....	3
4. Aims and Objectives.....	3
5. Data retention.....	4
6. HR Data	5
7. Finance Data	6
8. IT and Operations Data.....	7
9. Compliance Data.....	8
10. Media & Communications Data.....	8
11. Admissions Data.....	8
12. Exams Data	9
13. Registry Data.....	9
14. Student Services/Support Data.....	9

1 Introduction

In an era characterised by an ever-increasing volume of data generated and processed, it is imperative for organisations to establish robust frameworks for the management of such information. The Data Retention Policy of Oxford Business College (OBC) aims to provide a clear and structured approach to the retention, management, and disposal of data across various functions within the institution. This policy is designed to ensure compliance with applicable legal and regulatory requirements, particularly the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

Recognising the sensitivity of the data handled by the College, this policy delineates the types of information collected, the duration for which such data may be retained, and the protocols for secure disposal when data is no longer necessary for operational, legal, or compliance purposes. By implementing this policy, OBC seeks to uphold the principles of data protection and privacy, fostering a culture of accountability and transparency in its data management practices. This commitment not only safeguards the rights of individuals but also enhances the integrity and reputation of the College within the higher education sector.

2 Purpose

The purpose of this policy is to create a framework so that certain sensitive information data are regularly reviewed and disposed of when they are no longer needed.

3 Scope

The scope of this policy covers the retention of all data held by Oxford Business College ("the College"). Moreover, this also applies to any third-party contractors or vendors that may hold information on in order to conduct business with and for the company. This includes HR data, IT Data, Sales and Marketing Data, Finance Data and Lead Strategy Data.

The information contained in this policy represents the actions taken by the College concerning all data, and its storage or deletion.

4 Aims and Objectives

4.1 The Aims and Objectives of the Data Retention Policy at Oxford Business College (OBC) are as follows:

4.1.1 **Ensure Legal Compliance and Accountability:** To comply with relevant legal and regulatory requirements, fostering a culture of accountability in data management practices among staff and third-party contractors.

- 4.1.2 Promote Data Minimisation and Secure Disposal: To adhere to data minimisation principles by retaining only necessary information and implementing secure disposal processes for data that is no longer required.
- 4.1.3 Support Operational Efficiency: To enhance operational efficiency by ensuring that data is accessible when needed while minimising risks associated with the retention of obsolete information.

5 Data retention

5.1 The College implemented an information retention policy to ensure that all information kept for legal, regulatory and business requirements is limited. The College ensures that data will be:

- 5.1.1 Processed fairly and lawfully.
- 5.1.2 Adequate, relevant and not excessive.
- 5.1.3 Kept secure and be accurate.
- 5.1.4 Kept no longer than is necessary.
- 5.1.5 Processed in-line with the client's or employee's rights.
- 5.1.6 Not transferred to other countries that do not comply with the Data Protection Act 2018 and General Data Protection Regulation (GDPR).

Furthermore, processes are in place for secure disposal when data no longer needs to be retained for legal, regulatory and business requirements. An automatic or manual executed process is to be in place for identifying and ensuring secure removal of data.

The Data Retention policy contains a comprehensive list of information items held by the College, which must be retained for specified periods of time for legal, compliance or operational reason

6 HR Data

RECORD DESCRIPTION	RETENTION PERIOD	REASON
Recruitment Data: Name, contact information, information on CVs, interview responses	Deleted weekly from emails, daily from downloads, and retention periods for job boards	Operational and business reasons
Data for employee files and managing employee lifecycle/disciplinary proceedings, training: Name, ID, DOB, passport copies, information on CV, eligibility to work checks, DBS only for lecturers, medical data (health questionnaire on new starter pack) , long term sickness information, separate teams folder with ethnicity, diversity, emergency contact, next of kin, address, picture, location on campus, performance reviews, appraisals, training information, information about disciplinary proceedings	End of employment + 7 years	Taxes and Management Act 1970, Companies Act 2006, Limitation Act 1980
Keeping Freelancer Files: Certificates, qualification pack, passport, eligibility to work, personal details, health questionnaire	End of relationship + 7 years	Taxes and Management Act 1970, Companies Act 2006, Limitation Act 1980

7 Finance Data

RECORD DESCRIPTION	RETENTION PERIOD	REASON
Data for processing of payroll and employee expenses: Name, NI number, Tax number, whether it's their only job, DOB, date of starting the job, contact information(email, phone number), address, next of kin, bank account information, sick leave details, maternity leave information, pension contribution, pension ID, detail of expense claim, signature	End of employment + 6 years	Taxes and Management Act 1970, Companies Act 2006, Limitation Act 1980
Data for supplier onboarding, managing relationship and making payments: Name, bank information, email, telephone number, job title, company name, VAT number, company number	End of relationship + 6 years	Taxes and Management Act 1970, Companies Act 2006, Limitation Act 1980
Data for monitoring turnover and student payments and managing scholarships, bursaries and hardship funding: Name, payment information, contact information (email/phone number), bank details, OBC ID number, reasons for applying to scholarship/bursaries/hardship (potentially sensitive date), academic achievements	End of relationship + 6 years	Taxes and Management Act 1970, Companies Act 2006, Limitation Act 1980
Data for Students on Loan: Student name, student finance numbers, contact details, OBC ID, income received on behalf of that student.	End of relationship + 6 years	As instructed by the University Partner

8 IT and Operations Data

RECORD DESCRIPTION	RETENTION PERIOD	REASON
Data for creating user accounts: name, email, job title, mobile number	Accounts are deactivated at the end of employment	Operational Reasons to remove access
Data for providing IT support: Name, phone number, IT issue	1 year	Retain for a reasonable period to facilitate support services and track recurring issues.
Data for student set up for emails and Moodle: Student ID, course name and list of modules, name	Duration of Study	Retain for the duration of the student's enrolment to provide access to email and learning resources.
Data for tracking website visitors: Cookies, tags	3 Months	Retain for a limited time to analyse website performance and user behaviour, while respecting privacy.
CCTV Data: Video images and possibly audio recordings	3 Months	Retain for a limited time to enhance security, while respecting privacy; longer retention may apply in investigations.
Data for device inventory: Employee name, manager, department, signature, device number/information	End of employment + 5 years	Retain for the duration of the device usage for inventory management, tracking, and maintenance purposes
Data for visitor logs: Name, company name, time of entry and exit, photo (for digital system)	3 Months	Retain for a reasonable period for security purposes and to facilitate future visits, while respecting privacy

9 Compliance Data

RECORD DESCRIPTION	RETENTION PERIOD	REASON
Data for internal audits: Employee name, judgment on whether the process has been followed	1 Year	Retain for a reasonable period to facilitate audit trails, process improvement, and compliance with regulations.
Data for managing data subject rights: name, email, any information on request	Close of request + 5 years	For operational reasons such as management of possible claims/complaints and as evidence.

10 Media & Communications Data

RECORD DESCRIPTION	RETENTION PERIOD	REASON
Data about potential students/people making enquires: Name, email address, details of enquiry, mobile number, nationality	1 Year	Retain for a reasonable period to facilitate follow-ups, marketing, and recruitment activities.
Data for student events: Name, email, OBC ID, photos	1 Year	Retain for a reasonable period for record-keeping, promotion of future events, and community-building purposes.

11 Admissions Data

RECORD DESCRIPTION	RETENTION PERIOD	REASON
Data about Registering to Oxford Study: Name, DOB, email address, phone number, university preference, password	1 Year	As instructed by the University Partner
Data about application for Oxford Study: Gender, ethnicity, criminal conviction, postal address, location of travel , educational institution, settlement status, emergency contact information , name, accessibility needs, qualifications , job title, position, company name, info about socio economic background,	1 Year	As instructed by the University Partner

information about parents, passport, immigration status, qualifications, employment reference (one university partner requires everything re employment), name of referee		
---	--	--

12 Exams Data

RECORD DESCRIPTION	RETENTION PERIOD	REASON
Data for student exams: University ID, exam result, exam answers	Duration of Study +5years	As instructed by the University Partner

13 Registry Data

RECORD DESCRIPTION	RETENTION PERIOD	REASON
Data about enrolment spreadsheets: Name, personal details of students, enrolment details of students, acceptance status of students (this information comes from University Partner)	Duration of Study +5years	As instructed by the University Partner
Data for communications with students: Name, OBC email/personal, mobile phone number	Duration of enrolment	Retain for the duration of the student's enrolment to facilitate communication and support services.
Data for third party disclosures: Name, academic performance, attendance, photo, information asked by third party	5 years	Retain for a reasonable period to comply with legal and regulatory requirements, and to support future references.
Data for student complaints: Name, contact details, nature of complaint, reason for appeal, nature of mitigating circumstance	5 years	Retain for a reasonable period to comply with legal and regulatory requirements, and to facilitate process improvements and institutional learning.

14 Student Services/Support Data

RECORD DESCRIPTION	RETENTION PERIOD	REASON
--------------------	------------------	--------

<p>Data about counselling sessions: Name, University ID, address, financial status of student, family background, issues students are having</p>	<p>5 years</p>	<p>Retain for a reasonable period to comply with legal and regulatory requirements, and to support continuity of care and record-keeping. Confidentiality must be maintained.</p>
<p>Data for communications: Name, email, phone number</p>	<p>5 years</p>	<p>Retain for a reasonable period to facilitate communication, marketing, and networking activities.</p>