



THE
BEDFORD
COLLEGE
GROUP

Policy Name	Data Retention Policy
Department	Director of Governance
Created by (Job Title)	Director of Governance and Director of Information and Learning Technologies
Date Reviewed	May 2018
Date of Next Review	June 2020
Pathway	Intranet: IT Services > Policies and Procedures
E & D Policy Disclaimer	<p>This policy has been reviewed in line with the Equality Act 2010 which recognises the following categories of individual as Protected Characteristics: Age, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex (gender), Sexual orientation and Disability. We will continue to monitor this policy and to ensure that it has equal access and does not discriminate against anyone, especially any person/s listed under any protected characteristic.</p>

Data Retention Policy

1. Introduction:

In line with Data Protection Act 1998 and General Data Protection Regulations The Bedford College Group recognizes the need for a clear policy in respect to the retention of various records and documents maintained by The Group where personal or information of organisational importance is collected and processed.

1.1. This Data Retention Policy outlines the period for how long Personal Data, Sensitive Personal Data and data of organisational importance (together referred to as "Data") is to be kept.

1.2. This Data Retention Policy should be considered in conjunction with:

- Data Protection Policy
- Data Management Policy (including Breach notification form and Subject Access Request form)
- ICT Systems Acceptable Use Policy
- Relevant Employee related policies
- Relevant Student related policies
- Network Security Policy
- Mobile Devices and Laptops Policy
- Privacy Policy
- Data Retention Policy / guidelines
- Freedom of Information Policy
- Raising Concerns Procedure

1.3 The Bedford College Group is under a legal obligation only to keep personal data for as long as The Bedford College Group needs it. Once The Bedford College Group no longer needs personal data, The Bedford College Group must securely delete it. The Bedford College Group recognises that the correct and lawful treatment of data will maintain confidence in The Bedford College Group and will provide for a successful working environment.

2. Scope:

2.1. This procedure applies to The Bedford College Group including its wholly owned subsidiaries. It applies to all employees and all those working on The Bedford College Group operations who are involved in obtaining, handling, processing, storage, transportation and destruction of Data.

2.2. The Group's Retention Policy and schedules set out for how long certain types of records will usually be retained by the Group for.

2.3. It applies to all Data, irrespective of medium that The Bedford College Group holds in relation to identifiable individuals, even if that information may technically fall outside of the Data Protection Act 1998 and GDPR. This includes any and all

historic data held by the Group relating to the activities of Bedford College and Tresham College and also to any Data held on behalf of third parties in respect of any services delivered to these third parties by The Bedford College Group.

- 2.4. The retention periods, details as to who should be responsible for the holding of documentation and necessary actions to centralize retained documentation storage are set out in Appendix I.
- 2.5. Anyone who considers that this policy has not been followed in respect of personal information relating to them or other should raise the matter with their line manager or The Group's assigned Data Protection Officer without undue delay.
- 2.6. Any breach of this Retention Policy will be taken seriously and may result in action being taken under the Disciplinary Policy.

3. Roles & Responsibilities

- 3.1. Everyone who works for or with The Bedford College Group has responsibility for ensuring Data is collected, stored and handled appropriately. Each individual and team that handles Data must ensure that it is handled and processed in line with this policy, data protection principles and other relevant policies as outlined in 1.2 above.