



**WTC**  
**DATA RETENTION POLICY**  
**AND SCHEDULE**

**November 2024**

### WTC Data Retention Schedule

Purpose	This Data Retention Policy outlines how long an organisation will retain various types of data and the processes for managing and disposing of that data.
Enquiries	Enquiries about the Data Retention Schedule should be directed to the Data Protection lead (Carl Palmer) at ( <a href="mailto:dataprotection@wtctheology.org.uk">dataprotection@wtctheology.org.uk</a> )
UKPRN	10030973
Legal Address	16-17 Clarence Parade, Cheltenham, GL50 3PA
Author	Data Protection Lead
Approved by	Board of Trustees
Next Review	December 2024
The staff member responsible for updating the content of this document	Data Protection Lead ( <a href="mailto:dataprotection@wtctheology.org.uk">dataprotection@wtctheology.org.uk</a> )
Policy / procedure relevant to	WTC Staff (Policies G-folder) Link within the Privacy Policy

## 1 INTRODUCTION

WTC is committed to performing in line with best practice and legal requirements relating to the storage, retention and destruction of personal data:

- ❖ Article 5(1)(e) of the General Data Protection Regulation 2016/679 (“GDPR”) requires that personal data shall be kept in a form which permits the identification of individuals for no longer than is necessary.
- ❖ Article 5(1)(f) of the GDPR requires that personal data must be processed in a manner that ensures appropriate security of personal data, using appropriate technical or organisational measures.

This WTC Data Retention Policy sets out the rules and procedures around the retention of personal data within WTC and determines how long the college should be keeping certain categories of personal data. It also clarifies appropriate measures relating to retaining and destroying hard copy documents securely.

This policy also provides guidance on retaining and destroying hard copy documents securely.

**It is WTC policy to hold as much data as is practically possible online rather than in hard copies to support strong data protection and security practices.**

WTC’s Data Protection Lead (DPL) is responsible for overseeing compliance with Data Protection Laws, and this policy. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred to in the first instance to the Data Protection lead ([dataprotection@wtctheology.org.uk](mailto:dataprotection@wtctheology.org.uk)).

### 1.1 Audience

This Data Retention Policy applies to all those who work with WTC (staff, Hub and Programme Directors, volunteers) and contractors who have access to personal data. Serious or repeated breaches of this policy by someone working with WTC will result in disciplinary action and/or termination of the provision of services by WTC as appropriate.

This policy does not form part of any employee's contract of employment and may be amended at any time.

### 1.2 Policy review and updates

**All staff will review the areas of this policy for which they are responsible annually in September in time for Trustees to read and review the policy in the October Board meeting.**

**Please make sure that this policy is read in conjunction with WTC’s Data Protection Policy.**

### 1.3 Sensitive data

This policy relates to records, documents or information which capture personal data in any way. WTC will adopt a common-sense approach to decisions on how long to store documents and information which are sensitive in other ways (e.g. legally, commercially or financially), and when to destroy these.

Further information about the definition of personal data is set out in the Data Protection Policy.

## 2 RETENTION PERIODS

Personal data will be retained for the period indicated in the Retention Schedule (Appendix 1).

If WTC receives notice of any legal proceedings or legal action (or potential legal action), government or regulatory investigation, or a complaint or claim against or involving WTC, all data which may be relevant to that issue will be flagged and retained indefinitely. In these cases, WTC will appoint a legal team to help determine what information is/is not relevant for the case. Once the claim has concluded (i.e, a court judgement has been given or the claim has been settled), information about the claim will be kept for a further 6 years before being destroyed.

## 3 ARCHIVING PERSONAL DATA

When personal data is archived, WTC will ensure this happens within the retention periods set out in the Retention Schedule (Appendix 1).

In cases of safeguarding complaints, where data has been deleted, WTC may keep a note (securely stored) of the complaint and actions taken to address it, in case those involved make an enquiry about the case in future.

### 3.1 Hard copies

Any paper documents containing personal data must be shredded or placed in a secure, confidential document shredding box.

### 3.2 Hard drives

Once obsolete, computer hard drives and portable media used by WTC, or any third-party supplier, will be properly wiped or destroyed; and a certificate of destruction issued.

### 3.3 Email retention and deletion

In general, any emails containing personal details should be deleted when they are no longer current, unless they contain information which will be required in future, or details of decisions made which may need to be referred to in future. Attachments can be saved on G-drive securely. **Information from email correspondence which needs to be kept more than a month or two should be transferred to a Google Doc and stored in the relevant folder on G-Drive and the emails deleted.**

Emails which are not deleted, should be archived in folders so they can be relocated in future.

For emails relating to an ongoing case or claim, the Data Protection Lead may create a separate bundle (folder) meaning that staff do not retain these in their email systems.

## **4 DELETING OUT OF DATE DATA**

Article 5(1)(d) of the GDPR requires that personal data shall be accurate and, where necessary, kept up to date. Wherever information is out of date, it should be securely deleted in accordance with this policy.

## **5 ROUTINE DATA DELETION**

The Retention Schedule does not relate to redundant, obsolete or trivial information. This should be destroyed periodically by all staff, HD, PD and volunteers as part of routine housekeeping.

This does not apply to corporate records included in the Retention Schedule, which should only be destroyed when they have reached the end of their retention period.

Examples of information to be routinely deleted include:

- Draft documents - unless significant changes or deviations have taken place, when the draft may be retained to show how the final decision was made
- Emails - unless required to provide evidence of decisions made or action taken, sometimes in a shared folder (see 3.3). In these cases, early emails and duplicates can be deleted
- Duplicate documents and emails which can lead to confusion
- Research Material which is superseded by final policies, guidance, and/or advice
- Limited term information

## **6 EMPLOYEE TRAINING**

WTC will provide training and awareness to all employees, HD, PDs and volunteers on relevant policies, their responsibilities, and the importance of data protection, retention and privacy.

## **7 DATA SECURITY**

Security measures to safeguard data during retention periods will be established, including access controls, encryption, authentication mechanisms, regular security audits, and monitoring. The Data Protection Lead will be the main focal point for maintaining oversight of cybersecurity risks, data breaches, and incident response procedures within the policy, keeping the COO updated of any concerns.

## **8 UPDATING THE POLICY**

WTC reserves the right to change this policy at any time. Where appropriate, we will notify staff, HDs, PD and volunteers about those changes.

## APPENDIX 1: RETENTION SCHEDULE

All Types of Material data will be reviewed and updated annually on an agreed date. The Minimum Retention Period will also be reviewed in the light of current, relevant legislation.

### A. Company Records

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Register of Trustees' (WTC) and Directors' (WTCC) residential addresses	This register will be kept for the life of the company (Section 162 CA 2006), including entries for former Trustees and Directors. <i>This register will not be made available for public inspection</i>	Companies Act 2006 Companies Act 1985	Charity Secretary	Deletion of files from G-Drive  Shredding of any hard copies	Agreed with Charity Secretary
Board minutes	Minutes of Board Meetings held on or after 1 October 2007, will be kept for 10 years from the date of the meeting (section 248 CA 2006).  After this period, minutes containing	Companies Act 2006 Companies Act 1985	Charity Secretary	Deletion of files from G-Drive  Shredding of any hard copies	Agreed with Charity Secretary

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
	<p>personal data will be deleted.</p> <p>Online copies of minutes not containing personal data, and continuing records of key decisions) will be securely retained permanently as they are necessary to provide a historical record of WTC.</p> <p>Minutes of meetings held before 1 October 2007 will be kept permanently (section 382 Companies Act 1985).</p>				

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Certificate of Incorporation and Memorandum of Association	Online copies of these documents will be retained securely for the life of WTC, (to show WTC's compliance with the registration requirements of the CA) 2006 (section 15 CA 2006)	Companies Act 2006 Companies Act 1985	Charity Secretary	Deletion of files from G-Drive  Shredding of any hard copies	Agreed with Charity Secretary

**B. Employee HR records**

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Material that is regularly updated, such as an employee's home address	Personal employee details will be kept updated and previous records will be deleted	Data Protection Principles	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Recruitment and selection materials	6-12 months after the decision	The time limit for claim of discrimination,	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
rejected candidates		Employment Practices Code Part 1			
Job Applications and selection materials successful candidates	Length of employment plus 6 years	Company Policy	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Identification documents of foreign nationals (obligation to retain copies to perform immigration checks)	Minimum 2 years	Article 6 Immigration Restriction on Employment Order 2007	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Expat records and other records relating to foreign employees (eg. Visa work permit)	Maximum retention 6 years after employment ceases	Section 5 Limitation Act 1980	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
References and any required copies of documents	6 years after the contract ends (and longer where Care standards apply)	Evidence that checks were made	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Copy of identification	Maximum 6 years after	Section 5 Limitation Act	COO	Deletion from	Reviewed and

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
documents for Right to Work Checks	employment ceases	1980		G-drive and emails	Confirmed - JLW
Correspondence	When this contains personal data, this should be deleted as soon as personal data is processed	GDPR principle, DPA 5th principle	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Incidental correspondence with staff members	One year after the matter is closed	Data Protection Principles	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Material forming part of an employment contract, changes to T&C's	6 years after the contract ends (or after that provision is superseded)	The time limit for legal claim Section 5 Limitation Act 1980	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Data concerning a temporary worker	Maximum 6 years after employment ceases	Section 5 Limitation Act 1980	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Leave and absence records	6 years	May be relevant to claims of under-payment, unlawful deductions or	COO	Deletion from G-drive and emails, and employee record deleted from	Reviewed and Confirmed - JLW

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
		breach of contract Section 5 Limitation Act 1980		Timetastic	
Registration of work and rest periods if required if an obligation exists to show compliance	Minimum retention period 2 years	Working Time Regulations 1998	COO	Deletion from G-drive and emails and employee record deleted from Timetastic	Reviewed and Confirmed - JLW
Essential medical data required for employment purposes	Length of employment plus 6 years	HR good practice	COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Occupational health data and referrals	Length of employment plus 6 years	HR good practice	COO, SET	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Pension-related records	Defined Contribution: 6 years Defined benefit: until age 72	Consult pension provider	Finance	Deletion from G-drive and emails	Reviewed and Confirmed - JLW
Performance records (such as training or appraisal)	6 years after employment ends	The time limit for a legal claim	COO, SET	Deletion from G-drive and emails	Reviewed and Confirmed - JLW

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Disciplinary records	6 years after employment ends	The time limit for a legal claim	COO, SET	Deletion from G-drive and emails	Reviewed and Confirmed - JLW

### C. Finance/Payroll

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
General Accounting records (Internal financial statements, Annual plans and budgets)	6 years past the end of the financial year to which they relate	Statutory: Companies Act 2006	Finance	Deletion from G-drive and emails	Reviewed and Confirmed - TR
Accounting record (including audit): Taxation	10 years from tax year end or as required in the event of a tax investigation	Companies Act 1985 as amended by the Companies Acts 1989 & 2006.	Finance	Deletion from G-drive and emails	Reviewed and Confirmed - TR
Annual audited financial statements and report	Life of Group entity	Companies Act 1985 as amended by the Companies Acts 1989 & 2006.	Finance	Deletion from G-drive and emails	Reviewed and Confirmed - TR

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
VAT records (WTCC)	7 years from tax year-end	Value Added Tax Act 1994 (as amended).	Finance	Deletion from G-drive and emails	Reviewed and Confirmed - TR
Material related to income tax and National Insurance	3 years after the end of the tax year they relate to	Statutory: Income Tax Regulations	Finance	Deletion from G-drive and emails	Reviewed and Confirmed - TR
Evidence relating to Statutory Sick Pay, Statutory Maternity Pay, Statutory Adoption Pay and aStatutory Paternity Pay	3 years after the tax year they relate to	Statutory: SSP/SMP Regulations	Finance	Deletion from G-drive and emails	Reviewed and Confirmed - TR
Pay records and relevant supporting documents	7 years from financial year end (statutory limitation period)	The time limit for a legal claim of under-payment or unlawful deductions	Finance	Deletion from G-drive and emails	Reviewed and Confirmed - TR
Financial (including audit) sales and purchases	7 years from financial year end (statutory limitation period)	Companies Act 1985 as amended by the Companies Acts 1989 & 2006.	Finance	Deletion from G-drive and emails	Reviewed and Confirmed - TR
Financial (including	7 years from financial	Companies Act 1985 as	Finance	Deletion from	Reviewed and

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
audit) import/export	year end (statutory limitation period)	amended by the Companies Acts 1989 & 2006.		G-drive and emails	Confirmed - TR

## D. Marketing

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Contact details for validated students (email, telephone number, postal address, demographic information, marketing preferences and permission communication history, and variables derived from the individual's transactional)	Life of student (students are given option to become Alumni and sign up for marketing)	Internal Policy	Director of Events	This information is only held in CDMS	Reviewed and Confirmed - ST
Contact details for potential students based on consent (email and telephone number) for marketing through electronic channels (this may include	6 months from a contact, or 12 months after initial collection for a non-contact. Will be removed immediately when unsubscribed	Internal Policy	Director of Events	CDMS	Reviewed and Confirmed - ST

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
demographic information, marketing preferences, and communication history)					
Personal data used to carry out suppression requests (this may include email, telephone number, and postal address)	Indefinitely (held by Mailchimp)	To ensure we don't contact someone who has asked us not too	Director of Events		Reviewed and Confirmed - ST
Anonymised data used for analytical or statistical purposes	Indefinitely (but review every 5 years to make sure retention remains useful, even if anonymised data is out of scope of GDPR)	For institutional analysis and evaluation, record keeping marketing, analysis, evaluation, monitoring growth and numbers of people involved in diff roles/activities in WTC	SET	N/A	Reviewed and Confirmed - SET
Images, photography,	5 years from consent	'Modelling' contract	Comms Team	Archive edited	Reviewed and

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
film, case studies and related consent forms linked to media coverage for use in marketing materials and campaigns	expiry for use in marketing materials Delete raw files every 2 years	terms <ul style="list-style-type: none"> <li>- 10 years</li> <li>- Historical importance</li> </ul>		footage and pictures on encrypted GDrive after 3 years	Confirmed - Comms Team
Media coverage – records held consisting of news stories placed or press coverage received	Review after 3-5 years to determine if the coverage is historically important; part of a crisis piece; or relates to an organisational priority that needs further retention or archived	Company Policy	Comms Team	Delete	Reviewed and Confirmed - Comms Team
Audio Recordings from Residentials and VC recordings	1 Year from recording	Company Policy	Comms Team	Delete from all drives and cards	Reviewed and Confirmed - Comms Team

## E. Fundraising

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Active donor record – including but not limited to name, date of birth, address, consent and communication preferences, transactions, direct debit and gift /gift aid records, general correspondence and communication history	The lifetime of active interaction with an organisation	To facilitate ongoing donor relationships	COO/Principal	Deletion from G-drive and emails if appropriate	Review and Confirmed - JLW
Inactive donor record	7 years from the last interaction	GDPR	SET	Deletion from G-drive and emails	Review and Confirmed - JLW
Suppressed record (consent to engage/contact them withdrawn)	Indefinitely – reviewed every 5 years to make sure suppression and retention remain relevant	Company Policy	COO/Finance	N/A	Review and Confirmed - JLW
Analytics of donor record excluding all	Indefinitely, subject to review every 5 years to		COO/Finance	N/A	Review and Confirmed - JLW

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
personal information (except CRM ID and postcode district) required to be used for statistical or analytical purposes	make sure retention remains useful				
Confirmed legacy donor record or donor who has advised they are thinking about leaving a legacy to WTC in their will	A lifetime of active interaction with the organisation plus 20 years		COO/Finance	Deletion from G-drive and emails	Review and Confirmed - JLW

**F. Health and safety and environmental records**

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Health and safety	Life of Group entity,	Health and Safety at	COO	N/A	Review and

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
policies, systems, procedures, standards and guidance	required for evidence of compliance	Work Act 1974 (as amended)			Confirmed - JLW
Health and safety documents and records (including Annual summary, audit reports, incident notifications, investigation reports, safety alerts, training records, risk assessments carried out in compliance with law and method statements, correspondence with regulators, advice and related safety record correspondence)	Life of Group entity	Management of Health and Safety at Work Regulations 1999. Evidence of compliance with statutory provisions in the UK or overseas legislation where appropriate	COO/Office Manager	N/A	Review and Confirmed - JLW/TR
Incident, disease and dangerous occurrence books (such as 'accident books') and records including electronic records for reported accidents	3 years from the date of last entry or 7 years from reporting. Or, if the accident involves a young adult, then until that person reaches 21	Evidence of compliance with UK Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 or	COO/First Aiders	Deletion from G-drive and emails	Review and Confirmed - JLW/SB

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
and incidents		local or overseas legislation where appropriate			
Data re emergency medical care during Resi, individual reintegration plans, workplace adjustments, individual treatment agreements, fitness for work	Maximum of 6 years after expiry of employment	Limitation Act 1980, Data Protection Act 2018 and GDPR	COO/First Aiders	Deletion from G-drive and emails	Reviewed and Confirmed - JLW/SB
Fire risk assessment	Date of last fire risk assessment plus 5 years	Evidence of compliance with the Regulatory Reform (Fire Safety) Order 2005	COO/Office Manager (check lease)	Deletion from G-drive and emails, shredding of paper copies	Review and Confirmed - JLW/TR
Records of cleaning chemicals inline with COSHH compliance	Date tests were carried out plus 5 years	The Control of Substances Hazardous to Health Regulations 1999 and 2002 (COSHH).	COO/Office Manager (check lease)	Deletion from G-drive and emails, shredding of paper copies	Review and Confirmed - JLW/TR

### G. Safeguarding Data

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Safeguarding: child sexual exploitation, trafficking, sexually harmful behaviour, serious case reviews	100 years	Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Bill	Principal, COO	N/A	Review and Confirmed - JLW
Documentation related to Prevent incidents	Suggested maximum recommended: 6 years from last action	Prevent Duty Guidance: England and Wales (2023)	Principal, COO	Deletion from G-drive and emails	Review and Confirmed - JLW

### H. Miscellaneous Material

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Confidentiality and non-competition agreements (if a penalty is attached to the non-competition or confidentiality)	Minimum for the length of contract or agreement, but 6 years after the contract expires	Section 5 Limitation Act 1980	COO, MD WTCC	Deletion from G-drive and emails	Review and Confirmed - JLW

clause)					
Intellectual property records	The recommendation is to delete internally generated Faculty canned content 6 years after the Faculty Member stops teaching with WTC	Section 5 Limitation Act 1980	Principal	Deletion from G-drive	Review and Confirmed - BB
Material related to the protection of vulnerable adults	Personal records until they reach the age of 65 or for 10 years – whichever is longer	Statutory: IRMS, 2016	Safeguarding officers	Deletion from G-drive and emails	Review and Confirmed - JLW
Legal files concerning the provision of services (e.g., by lawyers, accountants, etc )	For the life of the intellectual property and 6 years after	Section 5 Limitation Act 1980	COO	Deletion from G-drive and emails	Review and Confirmed - JLW
Accident books and accident records	3 years after the date of the last entry	Statutory: RIDDOR	Office Manager	Shredding	Review and Confirmed - TR

## I. Misc Communications and Reporting

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Social media direct messaging (meta, X etc)	Delete after 180 days	Company Policy	Comms Team	Manually deleting all messages/Automatic deletion	Review and Confirmed - JLW
Breach Reporting	3 years after the investigation and remedial action were completed	Company Policy	DPL	Deletion from G-Drive	Review and Confirmed - CP
Data Subject Access Request (DSAR)	1 year after the DSAR is complete	Company Policy	DPL	Deletion from G-Drive	Review and Confirmed - CP
Finance Internal emails	Financial Year + 6 Years	Company Policy	Finance	Deletion for Gmail	Review and Confirmed - TR
Slack Messaging System	Chat data is cleared every 90 days	Company Policy	DPL	Automated by Slack	Review and Confirmed - CP
Study Skills support emails with students	Upon completion of student studies + 1 year	Company Policy	Learning Development Tutor	Delete emails	Review and Confirmed - CV

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Internal emails	No minimum, 3 year maximum	Company Policy	All Staff	Delete emails	Reviewed and Confirmed - JLW
Adjunct Faculty / Student communication emails	No minimum, maximum is completion of student studies + 3 years	Company Policy	Academic Team	Delete emails	Reviewed and confirmed - Registrar
Faculty who are Staff Student communication emails	No minimum, maximum is completion of student studies + 3 years	Company Policy	Academic Team	Delete emails	Reviewed and confirmed - Registrar
Record of modelling contracts/consent (Student Shorts)	Review after 6 years	Company Policy	Comms Team	Delete	Review and Confirmed - PS

## J. Academic Administration

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Records containing personal data on	End of 'registered student' relationship	Limitation Act, 1980.	Registry	CDMS to remove unwanted/not needed	Reviewed and Confirmed - AC/SB

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
individual students - data relevant for academic record and/or alumni who have given consent	with institution + 6 years  Anonymise non academic record based data for tracking student profiles over time			personal information, and just keep student name, number, Hub, academic achievement etc	
Student Core Record	Core transcript (name, dates of study, programmes and modules studied, grades, qualifications conferred) will be retained life of student plus 20 years and transferred to WTC's archive	Institutional Requirement	Registry	Scan and shred existing hardcopies of historic Chester paperwork for boards and student achievement	Reviewed and Confirmed - AC/SB
Records documenting the initial assessment of students including: 1. Student Qualifications on Entry	Termination of student relationship + 6 years	Limitation Act 1980 c.58 1973 Prescription and Limitation (Scotland) Act 1973	Registry	CDMS to remove date after set period	Reviewed and Confirmed - AC/SB

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
2. Study Skills Assessments					
Successful applications for admission	End of Student relationship + 6 Years	WTC Policy	Registry	CDMS to remove after set period	Reviewed and Confirmed - AC/SB
Records of individual student programme registration	Termination of student relationship + 6 years	Limitation Act 1980 c. 58 s 5	Registry	G:Drive and emails	Reviewed and Confirmed - AC/SB
WTC internal quality assurance processes	While current	Institutional business requirements	Registry	G-Drive and Moodle	Reviewed and Confirmed - AC/SB
notes on conduct and results of formal internal and external reviews of teaching quality and standards, and responses to the results	While faculty is employed or contracted with WTC + 6 years	Institutional business requirements.	Registry	G:Drive & Emails	Reviewed and Confirmed - AC/SB
Module descriptors	Life of module + 10 years	Institutional business requirements	Registry	G-Drive, moodle and CDMS	Reviewed and Confirmed - AC/SB

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Results of Graduate Outcomes Surveys / Alumni Surveys and (anonymised) summaries and analyses of the results of First Destination Surveys	Anonymised keep 20 years. Non-anonymised keep Current academic year + 6 years	Institutional business requirements	Registry	G:drive	Reviewed and Confirmed - AC/SB
Records of module accreditation from validating university	Life of module + 20 years (or accrediting university access limitation)	Institutional business requirements	Registry	G-Drive	Reviewed and Confirmed - AC/SB
Data on, and analyses of, student numbers	Current academic year + 20 years	Institutional business requirements	Registry	G:drive	Reviewed and Confirmed - AC/SB
Data on, and analyses of, module survey results	life of module + 1 year		Registry	G-Drive	Reviewed and Confirmed - AC/SB
Summaries and analyses of routine solicited feedback on taught programmes from staff, examiners and students. (Programme Peer Review Panels)	Current academic year + 20 years	Institutional business requirements.	Registry	G-Drive	Reviewed and Confirmed - AC/SB

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Submitted/completed assessments (formative and summative assessments) and feedback of assessments	Current academic year + 6 years	Limitation Act 1980 c. 58 s 5	Registry	deletion from g drive.  Moodle	Reviewed and Confirmed - AC/SB
Records of disciplinary proceedings against individual students and academic appeals	Last action on case + 6 years	Limitation Act 1980 c. 58 s 5	Registry	Deleted from drive, and emails	Reviewed and Confirmed - AC/SB
Documentation relating to student complaints by individual students where the formal complaints procedure is not initiated	Life of student study + 3 years (registration period of programme) (ADD THIS TO OTHERS)	Institutional business requirements.	Registry/COO	Delete emails and any related documentation	Reviewed and Confirmed - AC/SB
Documentation of formal student complaints against WTC	Last action on case + 6 years	Limitation Act 1980, c.58	Principal	Deletion from G-drive and emails	Reviewed and Confirmed - AC/SB
Master copies of procedures relating to validation administration	Academic year +20 years	Company Policy	Registry	Deletion from G-drive and emails	Reviewed and Confirmed - AC/SB
Documenting of	End of External	Company Policy	Registry	Deletion from G-drive	Reviewed and Confirmed

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
selection and appointment of external examiners	Examiners Contract + 6 years			and emails	- AC/SB
Records documenting liaison with external examiners on administrative matters	End of External Examiners Contract + 6 years	Company Policy	Registry	Deletion from G-drive and emails	Reviewed and Confirmed - AC/SB
Records documenting individual students' attendance at examinations,	End of programme + 6 years	Company Policy	Registry	Deletion from G-drive and emails  Delete from CDMS	Reviewed and Confirmed - AC/SB
The handling of reports of mitigating circumstances.	End of programme + 6 years	Company Policy	Registry		Reviewed and Confirmed - AC/SB
Records documenting the collation of examination results and compilation of pass lists and individual notifications of results.	End of programme + 6 years	Company Policy	Registry	Once information is on CDMS delete from G-drive and emails	Reviewed and Confirmed - AC/SB
documentation relating to individual students' submission of	End of Programme + 6 years	Company Policy	Registry	Once information is on CDMS delete from G-drive and emails	Reviewed and Confirmed - AC/SB

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
assessed work					
handling of reports of mitigating circumstances	End of programme + 6 years	Company Policy	Registry	Once information is on CDMS delete from G-drive and emails	Reviewed and Confirmed - AC/SB
Examples of past dissertations made available as examples to students of an excellent display of academic rigour	Indefinite in accordance with validating University's data retention schedule Additional permissioned is required	Institutional business requirements.	Registry	N/A	Reviewed and Confirmed - AC/SB

#### K. Study Skills/Learning Development

Type of Material	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Records of Learning Development support for students with specific needs	Current year + 7 years	The Equality Act 2010	Learning Development Tutor	Delete from shared Google drives.	Reviewed and Confirmed - Cv
Student	Academic year + 7	WTC Practices	Registry	Delete from shared	Reviewed and

Representative documentation	years			Google drives. and CDMS	Confirmed - AC/SB
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## L. Governance and Operations

Type of Material Miscellaneous	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Strategic Plan monitoring	Life of Strategic Plan & beyond for interest	Board of Trustees	COO	N/A	Reviewed and Confirmed - JLW
Documents relating to whistleblowing	Closure of case + 6 years	Limitation Act 1980 c. 58 ss 2 and 5	Principal/COO	Deletion from G-drive and emails	Reviewed and Confirmed - JLW

## M. Events

Type of Material Miscellaneous	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
Contacts database of contacts from events sign up	Deletion of Eventbrite data once imported to mailchimp.  Held until unsubscribe	WTC Practice	Director of Events	Manuel deletion in eventbrite  Mailchimp transfers information to	Reviewed and Confirmed - ST

Type of Material Miscellaneous	Minimum Retention Period	Reason	Ownership	Method of Destruction	Owner reviewed and confirmed
	through mailchimp (held under legitimate interest)			suppression list	

## APPENDIX 2: RATIONALE FOR THE DATA RETENTION POLICY

A Data Retention Policy ensures compliance, mitigate risks, optimise storage resources, and build trust with customers. It promotes good data governance practices and provides a framework for effective data management throughout its lifecycle, specifically supports:

- Legal and regulatory compliance
- Data governance and risk management: To establish clear guidelines for data management within WTC, ensuring data is properly classified, stored, and disposed of, reducing the risk of data breach, unauthorised access, and data misuse. Definition of retention periods for different types of data minimises storage of unnecessary or obsolete information, with accompanying security risk.
- Efficient data storage and management: Optimisation of data storage resources, reducing storage costs and ensuring essential data is accessible.
- Litigation and e-discovery: Ability to produce relevant data for legal process in the event of legal disputes or regulatory investigations.
- Identify and preserve relevant data: Saving time and effort, reducing legal costs.
- Customer expectations and transparency: Demonstration of WTC's commitment to manage data in a transparent and accountable way. Builds trust with stakeholders, by demonstrating clear guidelines in place for handling their personal information.
- Organisational efficiency: Clarity to staff regarding retention and disposal of data. Establishes consistent practices across WTC, ensuring everyone understands their responsibilities regarding data management. Improves efficiency, streamlines workflows, and reduces ambiguity handling data-related tasks.

## APPENDIX 3: DEVELOPING A DATA RETENTION POLICY

Developing a data retention policy involves careful consideration of various factors, including legal requirements, business needs, and data protection principles. Here are some steps to help you create a data retention policy (Figure 1 gives an overview of the steps):

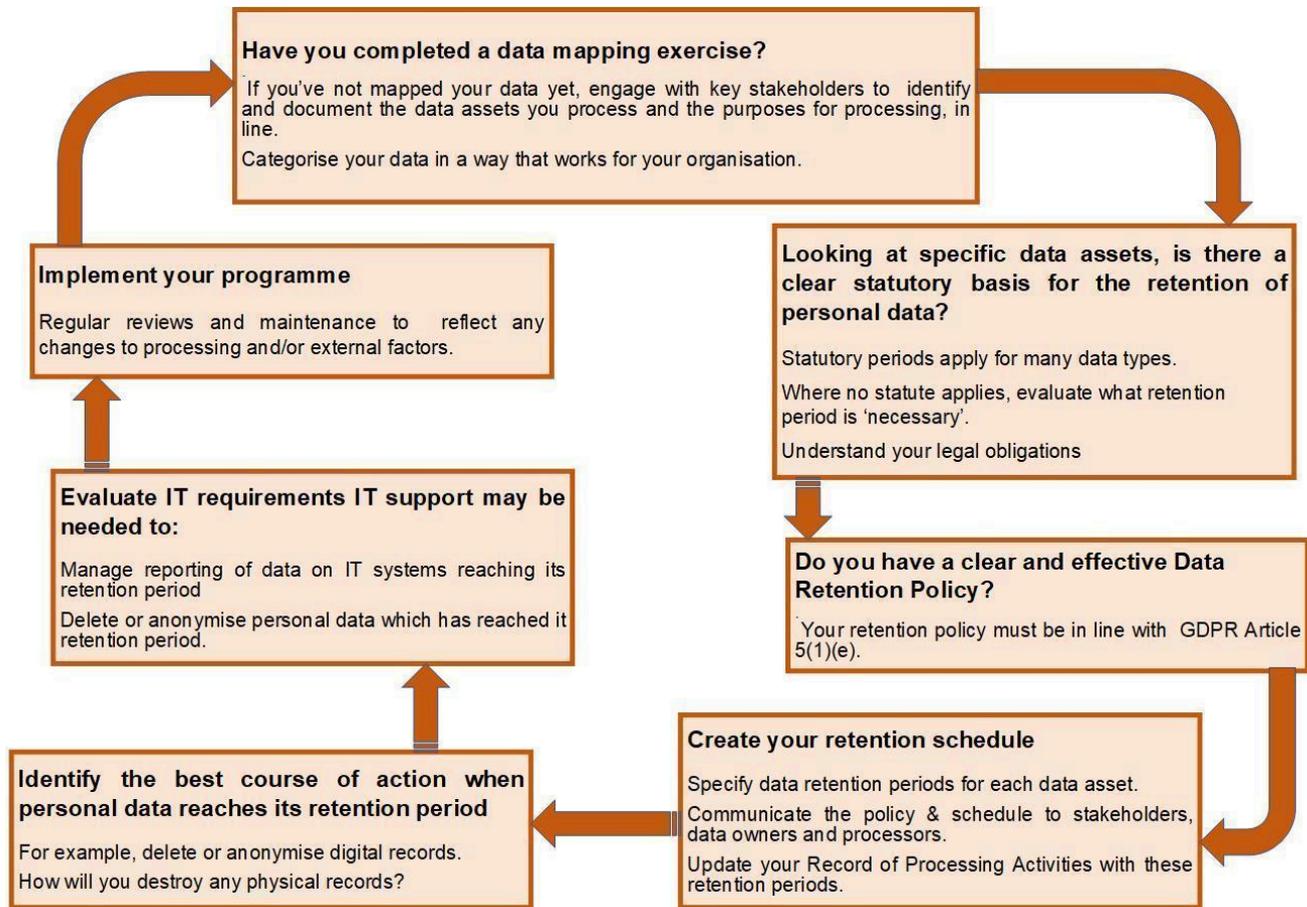


Figure 1 Overview of the steps to help create a Data Retention Policy

1. Understand legal and regulatory requirements: Research and identify applicable laws and regulations governing data retention in UK HEIs, including data protection laws, HE-specific regulations, and government mandates. Familiarise yourself with the specific requirements and obligations related to data retention periods.
2. Identify data categories: Determine and categorise different types of data collected and processed by WTC, based on sensitivity, criticality, and legal/regulatory obligations.
3. Define data retention periods: appropriate for each data category based on legal requirements, WTC needs, and risk assessment. Consider purpose of data collection, statutory limitations, contractual obligations, and potential litigation or audit requirements. Ensure the retention periods align with the relevant laws and regulations. Document data

handling procedures: Outline processes for collecting, storing, accessing, and disposing of data. Describe technical and organisational measures in place to protect data during its retention period. Include details about data backup, encryption, access controls, and monitoring mechanisms. Define protocols for data disposal or destruction when retention periods expire.

4. Address data subject rights: granted by data protection laws, (right to access, rectification, erasure, and objection). Specify how these will be addressed within the data retention framework and establish procedures for managing data subject requests.
5. Seek legal and professional advice: from legal counsel or privacy professionals experienced in data protection and retention privacy to ensure accuracy and compliance with applicable laws and regulations.