



# Data Protection Code of Practice

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With approval of:	Chief Information Officer

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## 1. Background & Context

Blackpool and The Fylde College (B&FC) is required by law to comply with the UK Data Protection Act 2018 (UKDPA18) and the UK General Data Protection Regulation (UKGDPR) and any amendments or conditions linked to that legislation. This document provides a framework to employees, students and clients of B&FC. It explains their individual responsibilities under the UK [General Data Protection Regulation](#) and signposts the various policies and procedures which exist to support them in discharging those responsibilities safely.

### The UK General Data Protection Regulation (GDPR)

UK DPA18 and UK GDPR are intended to protect any individual about whom information is captured or used.

This legislation regulates the use of information which can identify living individuals. Such information includes, *but is not limited to*:

- paper files
- electronic records
- database entries
- digital records
- images
- coursework
- social media content
- video or sound recordings
- email content
- minutes of meetings

The legislation also includes any information which, in isolation, cannot identify an individual but could do so when used alongside other information which is available to the user.

Under the UK Data Protection Act and UK GDPR, data must be

1. processed lawfully, fairly and in a transparent manner
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. accurate and, where necessary, kept up to date
5. kept for no longer than is necessary for the purposes for which they are processed
6. processed in a manner that ensures appropriate security including protection against unauthorised processing, accidental loss, destruction or damage

B&FC employees, B&FC students and individuals processing personal information on behalf of B&FC are responsible for adhering to the 6 UK GDPR data protection principles listed above at all times.

## 2. Ownership

B&FC is an incorporated further education institution and, as such, is a named *data controller* which is registered to process data with the Information Commissioner (Registration Number: Z4700416). The designated *Data Protection Officer* is accountable to the Information Commissioner for compliance with data protection legislation. His or her nominees will deal with day to day matters relating to data protection.

## 3. Authority & Scope of these Guidelines

### (i) Employees

It is a condition of employment that B&FC employees abide by any policies, procedures and codes of practice issued by B&FC. Failure to abide by this guidance may result in disciplinary proceedings.

Any employee who believes that the guidance has not been followed in respect of personal data about themselves or others should raise the issue with the Data Protection Office ([datarequest@blackpool.ac.uk](mailto:datarequest@blackpool.ac.uk)). If the matter is not resolved satisfactorily, the data subject may choose to raise a formal complaint with the Information Commissioner's Office.

### (ii) Students

Students who enrol with B&FC, agree to adhere to B&FC policies, procedures and any regulations by which B&FC is legally bound.

Any student who ignores his/her responsibilities in this respect may be subject to disciplinary regulations being invoked.

## 4. Responsibilities

Compliance with the UK GDPR is the responsibility of all B&FC employees, students and clients. Any breach of this legislation or of this document may lead to disciplinary action, access to college facilities being withdrawn or criminal prosecution.

### 4.1 Responsibilities of Students and Clients as Data Subjects

Students and clients are responsible for:

- checking that information held about them is accurate and up to date
- informing the College of any changes to the information held about them, e.g., change of address, change to married name etc
- advising B&FC if they intend to withdraw consent where consent is the lawful basis for processing their data
- reporting any known breach of Data Protection legislation, of data privacy or of their rights under that legislation

B&FC will take reasonable measures to maintain accurate personal data records but cannot be held responsible for inaccuracies where the student or client has not notified B&FC of a change.

An offer of a course place or business agreement may be withdrawn if information provided by the individual is found to have been intentionally falsified or omitted.

## 4.2 Responsibilities of Employees

### 4.2.1 As data subjects:

B&FC employees are responsible for:

- checking that information held about them is accurate and up to date
- informing Human Resources (HR) of any changes to the information held about them, e.g., change of address, change to name as a result of marriage/divorce etc.

B&FC cannot be held responsible for any inaccuracy unless the employee can demonstrate that s/he had previously notified the College in writing of the change(s) required.

### 4.2.2 As data handlers

As part of their responsibilities, employees may be required to record, store or use information about other people. If and when this is the case, employees must:

- (i) *ensure that any personal data they keep for any purpose is stored securely i.e., not accessible to other people*

If computerised, information should be password protected or stored on media which is itself kept securely (e.g., memory stick in locked cabinet). Paperwork containing personal information about anybody must be stored in locked cabinets or in a locked and secure room when not in use. Please refer to the [Clean Desk Clear Screen Policy](#).

- (ii) *ensure that personal data they record or keep is not disclosed to any unauthorised individual*

Information must be kept out of the view of others and in a place where unauthorised individuals are not able to access it (e.g., registers in locked cabinets or in secure rooms). Electronic information is subject to inadvertently being viewed by third parties so computer screens must be locked when unattended and passwords never revealed to anyone else. Use of another user's password or account details may result in disciplinary proceedings.

Information must not be discussed with unauthorised individuals or passed on in conversation or by any other means (e.g., discussions about course work, ability or personal circumstances). Please refer to the [Information Sharing Code of Practice](#).

- (iii) *ensure that information or data stored is destroyed appropriately and completely*

Information and data held about others must be destroyed completely in a manner which does not allow that information to be reconstructed or re-used.

Confidential waste bags and shredding machines are available on all College sites and must be used to destroy information stored on paper. If in doubt, please contact your administration office for help.

Deleting electronic information from memory sticks, discs or similar does not guarantee that the data cannot be retrieved. It may be necessary to burn or reformat such media and advice should be sought from IT Services about appropriate disposal of data stored on such media.

- (iv) *ensure that any students for whom they are responsible adhere to the guidelines in this policy*

Where students undertake research or projects using personal data, the data subject must be informed in advance of the proposed use of their information and must consent to their personal information being used. A Data Privacy Impact Assessment must be completed for the proposed research or project before it begins and all information must be kept securely.

- (v) *notify the college Data Protection Office about any personal data they systematically record, process, hold or use*

Existing data processes were logged in the central Data Processing Log as part of B&FC's GDPR readiness exercise. A Data Privacy Impact Assessment must be performed for any new processing or any significant change to existing processing. All

DPIA's will be signed off by the Data Protection Officer or his/her nominated representative.

*(vi) not disclose any personal information to another party without the consent of the data subject and the authority of the Data Protection Officer.*

Unauthorised disclosure of personal information may constitute a breach of UK GDPR. This will usually be a disciplinary matter and may need to be reported to the Information Commissioner.

A small number of exemptions permit disclosure of personal information without consent. These are specific cases as listed in law. They include sharing data with the police for the investigation of a crime. However, all exemptions must be authorised by the Data Protection Officer or his/her nominated representative.

*(vii) be aware of their responsibilities with respect to personal data and sensitive personal data*

Personal data is information that allows an individual to be identified when used either alone or in conjunction with other means at your disposal (or that are likely to become available to you). It is necessary to identify a lawful basis for recording, processing, holding or using any such information. In the absence of a lawful basis under UK GDPR, the data subject must provide consent.

## **Conditions for Processing Personal Data**

In order to process personal data, there must be a valid lawful basis for that processing. There are six valid lawful bases for processing. These are listed below.

The lawful basis also requires the processing to be 'necessary'. If B&FC can reasonably achieve the intended objective without the processing, the lawful basis is not valid.

Where the purpose for processing the personal data changes, a Data Privacy Impact Assessment must be performed. This must include the Data Protection Officer or his/her representative.

	Lawful Basis	What does that mean?
1	<b>Performance of Contract</b>	processing is necessary for a contract held with the data subject or because they have asked B&FC to take specific steps before entering into a contract
2	<b>Legal Obligation</b>	the processing is necessary for B&FC to comply with the law
3	<b>Vital Interests</b>	the processing is necessary to protect or save someone's life
4	<b>Public Interest or Exercise of Official Duty</b>	the processing is necessary for an organisation to perform a task in the public interest or for official functions the task or function must have a clear basis in law (e.g., protection of community health such as a gas company using phone numbers to tell people about a dangerous gas leak)
5	<b>Legitimate Interests</b>	the processing is necessary for B&FC's legitimate interests or the legitimate interests of a third party NB: if there is a good reason to protect the individual's personal data (e.g.: to protect their human rights), that right overrides the legitimate interest to process
6	<b>Consent*</b>	the individual has given clear consent for the processing of <i>specific data</i> for a <i>specific purpose</i>

### \*Consent

If the lawful basis is **consent**, this must be given freely and, crucially, *may be withdrawn at any time*.

A record must be kept of any consent. This must include which data will be processed and how the data will be used. Consent applies:

- to the specific data items listed
- for the specific purposes recorded

Processing additional to that listed requires additional consent.

Forms for capturing consent are available from the [Data Protection Office](#). The information may also be recorded in EBS for central monitoring.

A record must also be kept where consent is withdrawn. [The Consent Withdrawal Form](#) must be used for this purpose and must be forwarded to the Data Protection Office where the relevant data processing changes will be coordinated.



## Special Category Data

Special category data is information about:

- Race
- Ethnic origin
- Politics
- Religion
- Trade Union Membership
- Genetics
- Biometrics
- Health
- Sex Life
- Sexual Orientation

This type of data might create more significant risk to a person's fundamental rights and freedoms. For example, by putting them at risk of discrimination.

There are particular conditions for processing special category data and employees must consult with the Data Protection Officer before doing so. A Data Privacy Impact Assessment will be required.

## 5. Systems & Processes

5.1 Information is available about the systems, processes and procedures B&FC operates in respect of:

- the personal data B&FC collects and uses
- how data are captured and used
- why the information is required
- who has access to the information
- how B&FC protects personal data
- how long B&FC keeps personal data
- the rights of data subjects

This information is available on the B&FC website and in the following documents:

- [Clean Desk Clear Screen Policy](#)
- [Clean Desk Clear Screen Procedure](#)
- [Consent Withdrawal Form](#)
- [Data Protection Policy](#)
- Data Protection Code of Practice
- Data Retention Code of Practice (see Appendix A below)
- Freedom of Information Code of Practice
- [Information Sharing Code of Practice](#)
- [Procedure for Assessing and Reporting Data Breaches](#)
- Procedure for Data Privacy Impact Assessments
- Procedure for Processing Subject Access Requests

## 5.2 Retention of Data

Blackpool and The Fylde College will keep some types of information for longer than others depending on need. A schedule for the retention of different types of data can be found at Appendix A.

### 5.3.1 Destruction of Personal Information

B&FC will ensure that centrally managed information (e.g., information on the College student record system) is not retrievable or reusable after destruction. However, B&FC employees are responsible for the proper destruction of information they hold about others (see 4.2.2 iii).

B&FC will make facilities available for archiving and destroying such information. Contact the Data Protection Office for information about archiving and destroying data. It is not possible to centrally monitor every file on the College network. Hence, employees are responsible for notifying the Data Protection Office or IT Services when information stored on the college network needs to be destroyed according to Appendix A (Retention of Data).

## 5.4 Right to Access Information

Employees, students and other users of B&FC facilities have the right to access personal data held about them. Any person who wishes to exercise this right should contact the Data Protection Office at [datarequest@blackpool.ac.uk](mailto:datarequest@blackpool.ac.uk).

Parents and guardians of students aged 13 or over do not have an automatic right of access to information about their charges and will not be given access to any such data unless the student has formally advised that he or she consents to the release of that information. They should contact the Data Protection Office if they have any concerns about access to their child's personal data.

B&FC will make no charge for any initial subject access request. However, charges may apply if individuals request copies or submit repeat requests for very similar information.

B&FC will comply with requests for access to personal information within a month unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual.

Students (or their tutors) may occasionally be allowed limited access to closed student network accounts to retrieve work. They should contact to request this access via the IT Helpdesk and provide photographic identification. Any such access must be authorised by the Data Protection Officer (or his or her nominated representative) and is subject to certain restrictions.

Additional rights of access are governed by the Freedom of Information Act. A Code of Practice for compliance with this Act is also published by the College.

## 5.5 Examination/Progression Information

Examination seating plans, exam results, progression/destination data and other information about student outcomes may be displayed or published within the College. It is appropriate for us to do this as part of our normal business. However, B&FC will make every effort to make sure individuals are not immediately identifiable on any such lists. Where students will be clearly identifiable, staff must ask their consent to display personal details. Where consent is given, a record must be kept. Consent can be withdrawn at any time.

Any individual wishing to be excluded completely from published information should be directed to the [Data Protection Office](#) to discuss further.

## 5.6 Publication of Blackpool and The Fylde College Information

Information which is not personal data and is already in the public domain is bound by the terms of the Freedom of Information Act 2000. The College Publication Scheme lists information which is publicly available and can be found on the [B&FC website](#). Other information which does not identify individuals may be published in various ways.

Some limited personal data is also in the public domain. For example, information about senior post-holders is published in the College Financial Accounts which are a public record.

Personal information which is not in the public domain already will not be published without seeking consent from the individual to whom the information pertains. Consent can be withdrawn at any time.

## 5.7 Complaints

Individuals wishing to complain about this process may submit a complaint via the B&FC complaints procedure. Complaints should be addressed to the Director of Quality and Standards in the first instance. Complaints and Compliments forms are available at any reception.

In the event that an applicant is unhappy with the outcome of the Complaints Procedure, s/he may request an independent review. Requests for an independent review should be made to:

The Information Commissioner  
Wycliffe House  
Water Lane, Wilmslow  
Cheshire SK9 5AF

Tel.: 0303 123 1113

<https://www.ico.org.uk>

## **6. Contacts**

The Data Protection Officer can be contacted through the college reception at any time.

Questions or concerns about data protection or about this code of practice should be addressed to:

The Data Protection Office  
Blackpool and The Fylde College  
Ashfield Road  
Blackpool, Lancashire FY2 0HB

Tel: 01253 504604

Email: [datarequest@blackpool.ac.uk](mailto:datarequest@blackpool.ac.uk)

## APPENDIX A – Retention of Data

Blackpool and The Fylde College will keep some types of information for longer than others depending on need. The tables below indicates the periods of time different information will be held:

Type of Data	Retention Period	Reason(s)	Responsible
<b>5.2.1.1 Student Records - general</b>			
Student administrative records (paper) including, but not limited to, administrative enrolment details <ul style="list-style-type: none"> <li>Attendance records</li> <li>Examination/achievement</li> </ul>	No more than 20 years from the date the student leaves college.  To meet ESF audit obligations, <ul style="list-style-type: none"> <li>records from 2007-2013 will be retained until at least 31/12/2022</li> <li>records from 2014 onwards will be retained until 31/12/2030</li> </ul>	In case of litigation, audit or inspection  To comply with requests for references or copies of certificates.	Head SA
Tutor's Student Records (paper and electronic) including but not limited to: <ul style="list-style-type: none"> <li>Personal details</li> <li>Progress in class</li> <li>Academic work</li> <li>Work placement records</li> <li>Tracking database records</li> <li>Learning Support Records</li> </ul>	At least 1 year and no more than 20 years from student completion	Evidence for achievement To comply with requests for references or other information Monitoring of progression Meeting requirements of the Education Health Care Plan (EHCP) process Formal reviews	Dir Stud
Electronic central student records (administration)	Indefinitely	In case of litigation, audit or inspection To comply with requests for copies of certificates or references.	Head MIF
Back-ups of electronic records	No more than 3 years from date back-up created	In case of emergency or loss of critical data	Head ITS
All electronic and hard copy evidence relating to ESF funded provision (including evidence of display of ESF Logos)	To meet ESF audit obligations, <ul style="list-style-type: none"> <li>records from 2007-2013 will be retained until at least 31/12/2022</li> <li>records from 2014 onwards will be retained until 31/12/2030</li> </ul>	ESF Audit Requirements	Head MIF
Exam Board Minutes	At least 7 and no more than 20 years from year of Exam Board	In case of litigation, audit or inspection To comply with requests for course grading information or references.	Dir QS
HE Examination Scripts	At least 2 and no more than 20 years after the year of the Examination	In case of litigation, audit or inspection To comply with requests for course grading information or references.	Dir HE
Student Application / interview records	At least 1 and no more than 20 years after enrolment	In case of litigation	Head SA
Records of Safeguarding Cases, Incident or Investigations	Indefinitely	Safeguarding investigations	Dir Stud
Records of Learning or Other Personal Support	At least 7 and no more than 20 years after enrolment	In case of litigation or legal enquiries	Dir Stud
Electronic mail records	See Section 5.2.3		
Maritime Student Certificates	70 years from Seafarer's date of birth	Compliance with the requirements of the Maritime and Coastguard Agency (MCA)	Head Naut

<b>5.2.1.2 International Student Records - Tier 4 Visa Subjects</b>			
<p>Student's current passport details or immigration status document showing</p> <ul style="list-style-type: none"> <li>• Identity</li> <li>• Status</li> <li>• period of permission to stay in UK</li> <li>• Entitlement to work.</li> </ul> <p>Copy of UK Biometric Card Attendance/Absence Records History of and current accurate contact details Documents used in application or in establishing eligibility for place</p>	<p>For sponsorship less than 1 year:  Duration of sponsorship or until compliance officer approval whichever is longest.</p> <p>For sponsorship one year or more:  1 year or until compliance officer approval, whichever is longest.</p>	Compliance with Home Office requirements	Head SA
<b>5.2.1.2 Higher Education (HE) Student Records</b>			
Student coursework, examination scripts and assignments	At least 1 year after the academic year in which the student completes their course	To allow any assessment involved in an academic appeal to be resolved	Head CA
Student coursework, examination scripts and assignments that has been considered as part of the moderation process	At least 5 years after the academic year in which the student completes their course	To allow for audit and review	Head CA
Copies of examination papers and assignment coursework	Indefinite	Retained for archival value	Head CA
Records of rejected applications	At least 1 year	To allow any assessment involved in an academic appeal to be resolved	Head CA
Deliberative Board/Committee papers/minutes	Indefinite	Retained for review and archival value	Dir HE
Records of programme development	Indefinite	Retained for review and archival value	Dir HE
Programme handbooks	At least 10 years after academic year of issue	Retained for review and archival value	Dir HE
External Examiner reports	At least 10 years after academic year of issue	Retained for review and archival value	Dir HE
Programme Consultant reports	At least 10 years after academic year of issue	Retained for review and archival value	Dir HE
Annual Programme Review Documents	At least 5 years after academic year of issue	Retained for review and archival value	Dir HE
College Self-Evaluation Document	At least 5 years after academic year of issue	Retained for review and archival value	Dir HE
School Self-Evaluation Document	At least 5 years after academic year of issue	Retained for review and archival value	Dir HE
Minutes of Personal Mitigating Circumstances Panels	At least 5 years after academic year of publication	Retained for review	Dir HE
Minutes of Academic Malpractice Panels	At least 5 years after academic year of publication	Retained for review	Dir HE
Academic Appeal Panels	At least 5 years after academic year of publication	Retained for review	Dir HE
Board of Examiner minutes	At least 5 years after academic year of publication	Retained for review and archival value	Dir HE
Records documenting awards, classification and marks awarded to assessments	100 years after academic year of publication	Retained to provide factual information on what a student has studied and achieved i.e. transcript information	Head MIF

<b>5.2.2.1 Staff Records - general</b>			
Staff application/interview records	At least 6 months from the date of the interview	In case of litigation	Dir HR
Personnel files	6 years from end of employment	References and potential litigation	Dir HR
Staff Development Records	6 years from end of employment	References and potential litigation	Dir HR
Disciplinary Records	6 years from end of employment	References and potential litigation	Dir HR
Grievance Hearing Records	6 years from end of employment	References and potential litigation	Dir HR
Wages and salary records	6 years from end of employment (Electronic Records Indefinitely)	Compliance with Taxes Management Act 1970	Dir HR
Statutory Sick Pay records and calculations	6 years from end of employment	Compliance with Statutory Sick Pay (General) Regulations 1982	Dir HR
Health records	Until end of employment or 3 years later if termination of employment is connected to health.	Compliance with Management of Health and Safety at Work Regulations and limitation period for personal injury claims	Dir HR
Statutory Maternity Pay records and calculations	3 years from start of Maternity Leave	Statutory Maternity Pay (General) Regulations 1986	Dir HR
Facts relating to redundancies where less than 20 redundancies	No more than 3 years from the date of redundancy	Time limits on litigation	Dir HR
Facts relating to redundancies where 20 or more redundancies	No more than 3 years from the date of redundancy	Time limits on litigation	Dir HR
Electronic mail records	See Section 5.2.3 (Other)		Dir HR
<b>5.2.2.2 Staff Records - Tier 2 Visa Subjects</b>			
<b>Staff personal records</b>			
Where relevant, copy of UK Biometric Card History of contact information Copy of staff National Insurance Number, unless exempt  For Croatian Nationals, subject to worker authorisation, copy of Purple Registration Certificate showing entitlement to work for college Attendance/ Absence records  Staff current passport details or immigration status document showing <ul style="list-style-type: none"> <li>personal identity details (including biometrics)</li> <li>leave stamps</li> <li>period of permission to stay in the UK</li> <li>entitlement to work for College</li> </ul> <p>NB: The <i>only</i> exception is where individual is employed for one day or less and it is not practicable to obtain documents</p>	For sponsorship less than 1 year:  Duration of sponsorship or until compliance officer approval whichever is longest.  For sponsorship one year or more:  1 year or until compliance officer approval, whichever is longest.	Compliance with Home Office regulation	Dir HR
HR Pay/Contract Records  Copies of payslips, allowances paid and deductions made	For sponsorship less than 1 year:  Duration of sponsorship or until compliance officer approval whichever is longest.	Compliance with Home Office regulations	Dir HR

Type of Data	Retention Period	Reason(s)	
<p>Amount and frequency of salary payments for each member of staff, showing actual transfer of funds</p> <p>Where staff receive any allowances or additional service(s) as part of salary package, evidence of the allowance(s) or service(s) and a record of its value</p> <p>Job Description(s)</p> <p>Copy of staff contract of employment for the job they are being sponsored to do.</p>	<p>For sponsorship one year or more:</p> <p>1 year or until compliance officer approval, whichever is longest.</p>		
<p>HR Records of Staff Skills</p> <p>Where a requirement of job, copies of qualifications held to confirm skill level e.g., degree certificate, HND etc.</p> <p>Copies of registration and/or professional accreditation documents; any confirmation letters required to do the job. For example where the member of staff is a doctor, proof of registration with the General Medical Council.</p>	<p>For sponsorship less than 1 year:</p> <p>Duration of sponsorship or until compliance officer approval whichever is longest.</p> <p>For sponsorship one year or more:</p> <p>1 year or until compliance officer approval, whichever is longest.</p>	Compliance with Home Office regulations	Dir HR
<b>Recruitment Process for Tier 2 Visa Subjects</b>			
<p>Job/Vacancy Advertisements</p> <p>Where advertised in national press or professional journal, exact copy of advertisement</p> <p>Where advertised on internet, (including College website), screen shot of the advertisement on day first advertised Must show:</p> <ul style="list-style-type: none"> <li>• website name</li> <li>• advert content</li> <li>• date</li> <li>• URL</li> <li>• Application closing date</li> </ul> <p>Where head-hunters were used (prior to 6th April 2011),</p> <ul style="list-style-type: none"> <li>• copy of contract with head-hunter and/or brief</li> <li>• copy of report produced</li> <li>• copy of the invoice</li> <li>• copies of adverts placed showing title(s) of publication, date(s) and advert as it appeared.</li> </ul>	<p>For sponsorship less than 1 year:</p> <p>Duration of sponsorship or until compliance officer approval whichever is longest.</p> <p>For sponsorship one year or more:</p> <p>1 year or until compliance officer approval, whichever is longest.</p>	Compliance with Home Office regulations	Dir HR



Type of Data	Retention Period	Reason(s)	Responsible
<p>Where advertised online through Jobcentre Plus or Jobcentre Online, screen shot from relevant government website clearly showing:</p> <ul style="list-style-type: none"> <li>• logo of government website</li> <li>• advert content</li> <li>• vacancy reference number</li> <li>• date</li> <li>• URL</li> <li>• application closing date</li> </ul> <p>If recruitment agency used:</p> <ul style="list-style-type: none"> <li>• copy of the contract with agent</li> <li>• copy of invoice</li> <li>• copies of adverts placed showing title of publication, date(s) and advert as it appeared.</li> </ul> <p>In all cases, if the College name is not shown, clear evidence that the advertisement was placed (e.g., invoice)</p>			
<p>Other recruitment records including, but not limited to</p> <ul style="list-style-type: none"> <li>• Candidates short-listed for final interview (same medium as received; include name, address etc)</li> <li>• Names and number of applicants short-listed for final interview</li> <li>• Notes from final interviews conducted</li> <li>• Reasons for rejection where EEA national was not employed</li> </ul>	<p>For sponsorship less than 1 year:</p> <p>Duration of sponsorship or until compliance officer approval whichever is longest.</p> <p>For sponsorship one year or more:</p> <p>1 year or until compliance officer approval, whichever is longest.</p>	<p>Compliance with Home Office regulations</p>	<p>Dir HR</p>
<b>5.2.3 Other Records</b>			
<p>Medical records kept by reason of the Control of Substances Hazardous to Health Regulations</p>	<p>No more than 40 years</p>	<p>COSHHR 1994</p>	<p>Dir Est</p>
<p>Accident books, and records and reports of accidents</p>	<p>3 years after the date of the last entry</p>	<p>RIDDOR 1985</p>	<p>Dir Est</p>
<p>CCTV Records</p>	<p>At least 7 days</p>	<p>Safety, Security, Litigation</p>	<p>Dir Est</p>
<p>Student Trip records (including risk assessments)</p>	<p>3 years</p>	<p>In case of litigation, audit or inspection</p>	<p>Dir Est</p>
<p>Workplace Risk Assessments</p>	<p>As long as they remain relevant (minimum 3 years)</p>	<p>In case of litigation, audit or inspection <a href="#">Ongoing training and Safety</a></p>	<p>Dir Est</p>

Type of Data	Retention Period	Reason(s)	Responsible
<b>Finance Records</b> (Documents may be retained electronically, subject to a small number of exceptions ie Bank Interest certificates.)			
Accounts Payable Ledgers and Supporting Documentation	Min 6 Years from end of financial year to which the records relate.	Companies Act 2006 HMRC VAT / accounts records	Fin Cont
Accounts Receivable Ledgers and Supporting Documentation	Min 6 Years from end of financial year to which the records relate.	Companies Act 2006 HMRC VAT / accounts records	Fin Cont
All Accounting Subsidiary Records	Min 6 Years from end of financial year to which the records relate.	Companies Act 2006 HMRC VAT / accounts records	Fin Cont
Annual Financial Reports	Min 6 Years from end of financial year to which the records relate.	Companies Act 2006 HMRC VAT / accounts records	Fin Cont
Bank Reconciliations and Bank Statements	Min 6 Years from end of financial year to which the records relate.	Companies Act 2006 HMRC VAT / accounts records	Fin Cont
Capital Expenditure	6 Years after disposal of equipment	HMRC requirement on Corporation Tax	Fin Cont
Expenses & Benefits records	Min 6 Years from end of financial year to which the records relate.	HMRC requirement	Fin Cont
Income Tax and NI returns, including correspondence with tax office	Current plus 3 previous tax years	Income Tax (Employment) Regulations 1993	Fin Cont
Supplier Contracts	3 Years from completion of contract	Recommended Internal Practice	Fin Cont
VAT Returns	Min 6 Years from end of financial year to which the records relate.	HMRC requirement	Fin Cont
<b>Legal Records</b>			
Certificate of Insurance	7 Years after expiration	Insurance & Legal Records	Dir Est
Insurance Policies	7 Years after expiration	Insurance & Legal Records	Dir Est
Accident Reports and Claims	7 Years after case is settled	Insurance & Legal Records	Dir Est
Litigation Records – Consent Orders, Judgments, Court Orders Disposing of Litigation, Releases and Settlement Agreements	Permanent	Insurance & Legal Records	Dir Est
Litigation Records – Documents of Historical Significance (e.g. Trial Transcripts, Deposition Transcripts, Litigation significant to the history of the College)	Permanent	Insurance & Legal Records	Dir Est
As Built Drawings	Permanent	Insurance & Legal Records	Dir Est
Building Permits	1 Year after final Completion	Insurance & Legal Records	Dir Est
Deeds	Permanent	Insurance & Legal Records	Dir Est
Leases	5 Years from expiration of lease	Insurance & Legal Records	Dir Est
Construction/Remodeling	Permanent	Insurance & Legal Records	Dir Est
Plans and Specifications	Permanent	Insurance & Legal Records	Dir Est
Purchase Agreements	Permanent	Insurance & Legal Records	Dir Est
Routine Incidental Maintenance	3 Years from completion	Insurance & Legal Records	Dir Est

Sale Agreements	Permanent	Insurance & Legal Records	Dir Est
Title Insurance Policies	7 Years after sale of property	Insurance & Legal Records	Dir Est
<b>Electronic Mail – staff and student</b>			
E-Mail	Until deleted by user or account closure + 90 days	Retrieval of work; continuity of teaching or business	Head ITS
Back-Ups of E-Mail Server	14 Days	Retrieval of work; to access information for continuation of teaching or business	Head ITS
Contents of network folders relating to user account	90 days after account closure Exceptions (retained indefinitely): Principal & Deputy Principal Executive Directors Dir Q&S & CIO IT Services Staff Head MI&F	Retrieval of work; to access information for continuation of teaching or business	Head ITS
<b>Electronic files; user account, H Drive, Onedrive, emails</b>			
Student user accounts, H drive, Onedrive, emails	5 years following course completion	Internal/external verification purposes.	Head ITS
Curriculum Employees	2 years following cessation of employment <b>Exemptions:</b> Heads/Directors who are members of management forum, Employees on the Exceptions list	To access information for continuation of teaching or business	Head ITS
Non- Curriculum Employees	6 months following cessation of employments <b>Exemptions:</b> Heads/Directors who are members of management forum, Employees on the Exceptions list	To access information for continuation of teaching or business	Head ITS
Management Forum Employees	7 years following cessation of employment	To access information for continuation of teaching or business	Head ITS
Exceptions	Indefinite	To access information for continuation of teaching or business	Head ITS
<b>General</b>			
All documents relating to governance of the college including membership, activities and meetings of the Governing Body.	For the duration covered by the governing body in question plus 50 years	Compliance with sector best practice	Clerk to the Board
All documents submitted as part of the College's application to become a licensed Tier 4 sponsor.	For the duration of the period covered by the licence	Compliance with the Home Office retention periods	Head SA
Dir Stud Dir Est Dir HE Dir HR Dir QS	Director for Students Director of Estates Director of Higher Education Director of Human Resources Director of Quality & Standards	Fin Cont Head ITS Head MIF Head Naut Head SA Head CA	Financial Controller Head of Information Technology Services Head of Management Information & Funding Head of Nautical Campus Head of Student Administration Head of Curriculum Area

NB: The list is not exhaustive. New data types can arise at any time as a result of development work, Government policy etc.