



DATA RETENTION POLICY

1 POLICY

- 1.1 Coventry College (the "**College**") must, in respect of its processing of personal data, comply with the Data Protection Act 2018, the General Data Protection Regulation 2016/679, and related legislation (together, "**Data Protection Laws**").
- 1.2 This Retention Policy should be read in conjunction with the College's Data Protection Policy, which sets out the College's overall approach to data protection matters and sets out the rationale for why a Retention Policy is required for personal data.
- 1.3 The College is under a legal obligation only to keep personal data for as long as the College needs it. Once the College no longer needs personal data, the College must securely delete it. The College recognises that the correct and lawful treatment of data will maintain confidence in the College and will provide for a successful working environment.
- 1.4 This Policy applies to all College employees, consultants, contractors and temporary personnel hired to work on behalf of the College ("**College Personnel**").
- 1.5 All College Personnel with access to personal data must comply with this Retention Policy.
- 1.6 Please read this Retention Policy carefully. All College Personnel must comply with it at all times. If you have any queries regarding this Retention Policy, please consult your manager and/ or the Data Protection Officer. You are advised that any breach of this Retention Policy will be treated seriously and may result in disciplinary action being taken against you.
- 1.7 This Policy, and periodic revisions of this Policy, will be communicated to staff. This Policy does not form part of any College Personnel's contract of employment and the College reserves the right to change this Policy at any time. All College Personnel are obliged to comply with this Policy at all times.

2 ABOUT THIS POLICY

This Retention Policy explains how the College complies with our legal obligation not to keep personal data for longer than we need it and sets out when different types of personal data will be deleted. In particular, it sets out details of the College's policies for the retention of Special Category personal data.

3 DATA RETENTION PERIODS

- 3.1 The College has assessed the types of personal data that the College holds and the purposes the College use it for. Annex A to this policy sets out the retention periods that the College has set for the different departments within the College, and the different types of data that they each hold.
- 3.2 If any member of College Personnel considers that a particular piece of personal data needs to be kept for more or less time than the period set out in this policy, please contact the Data Protection Officer for guidance.

4 CHANGES TO THIS POLICY

The College reserves the right to change this policy at any time.

Employee/personnel records

Personal Data Held In	Retention Period	Reasons for Retention Period
Medical records – medical records cards, medical examinations and health questionnaires	30 years after employment ceases	Commercially Sensitive
Accident reports	Indefinite	Commercially Sensitive
Details of medical schemes	Indefinite	Commercially Sensitive
Organisation charts	Indefinite	Commercially Sensitive
Staff personnel records	7 years after employment ceases	Statute of Limitations
Salary registers	6 years	Taxes Management Act
Expense accounts/records	7 years	Statute of Limitations/Taxes Management Act
Overtime records/authorisation	3 years	Commercial/audit
Claims for redundancy & long service award	7 years after employment ceases	Statute of Limitations

Payroll Documentation

Personal Data Held In	Retention Period	Reasons for Retention Period
Income tax records re employees	6 years	Taxes Management Act
Notice to employer of tax code	6 years	Taxes Management Act
Certificate of pay and tax deducted	6 years	Taxes Management Act
Notice of tax code change	6 years	Taxes Management Act
Annual return of taxable pay and tax deducted	6 years	Taxes Management Act
Records of pension deductions (including superannuation)	6 years	Pensions Act 1995
Clock cards	2 years	Audit
Copy pay slips	2 years	Commercial and Audit
Payroll and payroll control account	7 years	Statute of Limitations and Taxes Management Act.

Student records

Personal Data Held In	Retention Period	Reasons for Retention Period
Student Enrolment forms (paper)	2 Years	Electronic data relied on once all data input
Student records, relating to academic achievement and conduct	6 Years	Limitation period for litigation
Student data – alphabetical listings	10 Years	ESFA funding requirements
ESFA Data returns	10 Years	ESFA funding requirements
Student Registers	10 Years	ESFA funding requirements

Statutory records

Personal Data Held In	Retention Period	Reasons for Retention Period
Details re current pensioners	10 years after benefit ceases	Commercial
Changes of payment	6 years	Statute of Limitations
Payroll control account	7 years	Statute of Limitations and Taxes Management Act.
All trust deeds and rules	Indefinite	Companies Act, Commercial and Pensions Act 1985
Trustee minute book	Indefinite	Companies Act, Commercial and Pensions Act 1985
Governor Records	2 Years after cessation	Members' Report and Financial Statements.
Annual accounts	Indefinite	Companies Act, Commercial and Pensions Act 1985
Investment and Insurance Policy records	Indefinite	Companies Act, Commercial and Pensions Act 1985
Actuarial reports	Indefinite	Companies Act, Commercial and Pensions Act 1985
Contribution records	Indefinite	Companies Act, Commercial and Pensions Act 1985
Group health policies	12 years after final cessation of benefit	Statute of Limitation
Group personal accident policies	12 years after final cessation of benefit	Statute of Limitation

Purchase invoices and supplier documentation

Personal Data Held In	Retention Period	Reasons for Retention Period
Payment cash book or record of cheque payments	6 years	Companies Act/Charities Act
Purchase Ledger	6 years	Companies Act/Charities Act
Invoice – revenue	6 years	Companies Act/Charities Act
Invoice – capital item	10 years	Companies Act/Charities Act and commercial considerations
Invoice – Subcontractor Training All subcontractor documents regarding Student participation, both manual and electronic documents, must be submitted to the college, at the completion of the contract, in order that they can be retained correctly.	See Note 1	ESF Policy Directive
Successful quotations for capital expenditure	3 years	Commercial and Audit considerations
Petty cash records	7 years	Companies Act, Charities Act and VAT.

Note 1: where any documents are required to support a claim for ESF funding, the retention period will be extended to three years after the European Commission has made the final payment for the programme. Prior to the destruction of any records; it is the responsibility of the Manager who "owns" the documents to confirm:

- (i) whether they are required to support an ESF funding claim and*
- (ii) the actual retention date for that ESF funding programme.*

Information regarding retention periods for ESF programmes can be obtained on-line.