



Policy on the Retention of Data and Records

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1. Introduction

William College acknowledges the importance of protecting sensitive information and ensuring proper management structures are in place. These principles are key to not only safeguard information but also to support and enhance precise and effective decision-making in core functions.

In addition, this policy outlines the responsibilities, timelines and structured support for the retention and destruction of official records in compliance with the regulatory and legal obligations outlined in legislation such as the Data Protection Act (2018) and the General Data Protection Regulation UK (UK GDPR).

Additional details and guidance on how William College complies and regulates with data protection standards can be found in our Data Protection Policy. A detailed explanation covering the reasons the College collects personal data, the types of data collected, and the onward uses of data can be found in the Privacy Notice.

2. Purpose

William College is committed to maintaining accurate, secure, and reliable student data and records. This policy sets out clear requirements for the creation, handling, storage, retention, and disposal of student records throughout their lifecycle. It ensures that all records are managed in a way that protects confidentiality, preserves integrity, and supports transparency, while complying with data protection legislation and relevant legal and regulatory requirements. The policy also establishes expectations for staff, including the provision of appropriate training and support to enable the effective and compliant management of student records.

William College is required to retain specific data and records for administrative and operational purposes, as well as to ensure continued compliance with regulatory and statutory requirements. Once registered with the Office for Students (OfS), William College is required to provide student data to the designated data body (Jisc/HESA) under OfS Condition of registration F4. This will be done in the form, manner and timing specified by Jisc (including statutory data collections). This policy supports those obligations by defining the student records held and their retention period. William College will only use and hold records for specific purposes in line with the core principles of Data Protection and Records Management.

3. Scope

This Policy outlines how William College handles official student data and records, and applies to all faculty, staff, contractors, and students who handle student data. Compliance to this policy is mandatory and any breach may result in disciplinary action. All Directors, Heads of Departments, and managers are responsible for ensuring all staff under their supervision comply with this policy and develop appropriate practices, control measures, procedures, and training for proper compliance. The Data Protection Officer (DPO) oversees the implementation and review of this policy.

The key fields to identify students, or core records as defined by Jisc, must be given special consideration and retained in archives for the student's lifetime, a period estimated at 60 years after graduation. The records must include:

- Student name and identifier (Student ID number).
- Date of birth.
- Course dates.
- Type of award, date and result.

4. Responsibilities

Department/ Individual	Responsibilities
Campus Operations Manager	• Ensure IT infrastructure and services align with this policy and allow for data disposal as specified in the Retention Schedule.
Registry, Data and Compliance Manager	• Oversee data accuracy and procedures that ensure records are kept accurate and up to date.
Data Protection Officer	• Supervise implementation of and propose amendments to the Policy as appropriate. • Ensure destruction of records and receive confirmation of destruction. • Advise and support staff in relation to any records not mentioned in this policy. • Conduct audits for: proper record upkeep, destruction and notices of any data breaches.
Data Insights & Statutory Returns Officer	• Support the DPO in internal audits and data protection administration
Heads/Managers of Departments/Divisions	• Implement the deletion of Student records Collected and processed. • Ensure compliance with this policy for their respective staff.

5. Procedures Retaining and Disposal of Records

5.1 Creation

It is recommended that records are stored electronically wherever possible. This will assist in reducing the costs of storage and aid easy access and retrieval. Stored records should ideally be stored in a purpose-made system like a Student Records System or indexed. Indexed electronic records should be retained in shared drives on the College server. Records should not be stored outside of the College's computer systems, for example, on Google Drive, local drives of desktop or laptop computers.

Where possible, electronic records should be preferred over paper records. William College does not have a central storage facility for paper records. For records kept in paper format, appropriate secure storage must be sourced and maintained for the relevant retention period while being digitalised. Paper records must be appropriately secured against damage, for example, by fire or water.

5.2 Destruction

On expiry of the relevant retention period, the department responsible for the record must review it and either decide to destroy or secure the record (e.g. remove any personal data). Should there be grounds for extending the retention period, an adequate and auditable assessment must be carried out, with a

documented report providing sufficient justification. This process should be undertaken in consultation with the DPO. See Jisc (HESA) collection notices for statutory retention guidance related to HE datasets: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>

The content of the record should be considered an ongoing value to the College. In limited circumstances, where a record holds specific value to the establishment and history of William College, records may be suitable for permanent retention in archive.

Once a decision has been made to destroy a record, it must be destroyed securely and confidentially. Paper records must be disposed of via shredding or by an external confidential waste management company. All instances of record disposal must be communicated to the DPO.

All IT assets (e.g., hardware and records stored electronically) must be disposed of in line with data protection principles.

Records must not be destroyed with the purpose of concealing data requested under the Data Protection Act. It can be a personal criminal offence for William College staff to destroy information requested under either of this Act.

5.2.1 Legal Holds

Where litigation, audit, investigation or information requests are reasonably anticipated, records subject to a legal hold will not be destroyed until the hold is lifted.

6. Compliance and Monitoring:

William College is committed to ensuring that all student records are managed in accordance with applicable legal, regulatory, and institutional requirements. To maintain the integrity, accuracy, and confidentiality of student records, the following compliance and monitoring measures shall be observed:

Oversight Responsibility:	The DPO, in collaboration with the Registry Manager and Campus Operations Manager, shall be responsible for overseeing compliance with this policy.
Regular Audits:	Scheduled audits of student records, both physical and digital, will be conducted at least annually. Audits will verify accuracy of data entry, adherence to retention schedules, and compliance with data protection laws such as the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
Exception Reporting:	Any irregularities, breaches, or deviations from established retention practices must be reported immediately to the Registry Manager, who will initiate a review and, if necessary, corrective measures.
Documentation of Compliance:	Departments maintaining student records must complete compliance checklists confirming correct classification, storage, and disposal in line with retention schedules. These checklists shall be reviewed by the DPO or delegate.
Continuous Improvement:	Findings from audits and exception reports will be used to update procedures, retention schedules, and staff training, ensuring ongoing alignment with sector best practices and regulatory requirements. The DPO or delegate will report any relevant event to the Information Commissioner's Office or successor as per relevant regulation.

Non-compliance may result in disciplinary action and, where applicable, referral to external authorities in line with statutory obligations.

7. Training and Communication:

Effective implementation of this policy requires ongoing training and clear communication across all departments handling student records. The College will ensure that all relevant staff, faculty, and administrators are aware of their responsibilities through the following measures:

Mandatory Induction Training:	All new employees with responsibilities for creating, maintaining, or disposing of student records must complete a training module on records management, retention requirements, and data protection laws within their first month of employment.
Ongoing Professional Development:	Annual refresher sessions will be provided to ensure that staff remain up to date on policy changes, regulatory developments, and emerging risks in records management.
Guidance Materials:	The College will provide accessible guidance, including quick reference sheets, FAQs, and workflow diagrams to support staff in applying the policy consistently in day-to-day operations.
Targeted Communications:	Updates or revisions to the Policy on the Retention of Student Data and Records will be communicated promptly to all relevant staff through email bulletins, staff meetings, or the College intranet as appropriate.
Managerial Responsibility:	Line managers are accountable for reinforcing compliance within their teams by ensuring staff have completed training, understand retention schedules, and apply them correctly.
Feedback Mechanism:	Staff may raise questions or suggest improvements to records practices to the DPO, ensuring that communication is two-way and responsive to operational needs.

By embedding training and communication as core elements of this policy, William College ensures that all staff are equipped to manage student records responsibly, safeguarding institutional accountability and student trust.

8. Policy Review

The Senior Leadership Management Team will review and amend this policy at least every 18 months, or earlier if there are changes to regulations or partner legislation.

9. Related Policies

- Privacy Policy
- Information Control Procedures
- Information Security Policy
- Data Protection Policy
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10. External Legislation

- Data Protection Act 2018
- UK General Data Protection Regulation (GDPR)

11. Appendix A: Retention Schedule

As based on Jisc's sector-specific retention schedule¹. Where multiple timelines exist, whichever is longer applies:

Data Category	Retention Period	Responsibility	Location	Action Required at End of Retention Period
Admissions and Recruitment				
Design, operation and results of recruitment schemes and campaigns	Current academic year plus five years OR termination of scheme/campaign plus five years	Registry Manager	Recruitment Portal / William College marketing channels (i.e. social media) / OneDrive / SharePoint	Erase / Destroy
Design, organisation and summary results of recruitment events.	Completion of event plus five years	Chief Executive Officer	Recruitment Portal / William College marketing Channels (i.e. social media) / OneDrive / SharePoint	Erase / Destroy
Campaigns and event data (i.e. attendees' details)	Current academic year plus five years	Partnership Development Manager	Recruitment Portal / One Drive / SharePoint	Erase / Destroy
Records of enquiries from prospective students (Subsequently registered as a student)	Current academic year plus five years	Registry Manager	Recruitment Portal / One Drive / SharePoint	Erase / Destroy
Records of enquiries from prospective students (Subsequently not registered as a student)	Current academic year plus one year	Registry Manager	Recruitment Portal / One Drive / SharePoint	Erase / Destroy
Successful applications files (not including records held as Core Student records)	Student graduation or departure plus six years	Registry Manager	Admission Portal / Outlook / social media	Erase / Destroy
Unsuccessful application files	Current academic year plus three years	Registry Manager	Admissions Portal	Erase / Destroy
Applicant complaint (where applicable)	Five years since date of complaint submitted	Registry Manager	Admissions Portal	Erase / Destroy
Records of Induction and Events for New Students	Current academic year plus one year	Campus Operations Manager	Network / Admissions Portal / SharePoint / One Drive	Erase / Destroy

¹ <https://www.jisc.ac.uk/guides/records-retention-management>

Data Category	Retention Period	Responsibility	Location	Action Required at End of Retention Period
Academic and Student Administration				
Disability records including DSA, reasonable adjustment, independent learning plan, fitness to study	Graduation or student departure plus six years	Student Support & Wellbeing Manager	Student Information Management System / OneDrive / Share Point	Erase / Destroy
Records of student's engagement	Graduation or student departure plus six years	Registry Manager	Student Information Management System / OneDrive / Share Point	Erase / Destroy
Student Assessment and Progression				
Records confirming annual registration	Retained as part of 'core student record'	Registry Manager	Student Information Management System	Retained as part of 'core student record' (Section 4 of the present document)
Records documenting the control of examination papers and examination scripts	Current academic year plus one year	Registry Manager	Moodle	Erase / Destroy
Records documenting the timetabling of examinations	Current academic year plus one year	Campus Operation Manager	Student Portal / Website / One Drive / Share Point / Moodle	Erase / Destroy
Submitted / Completed summative assessment including projects and dissertations	Graduation or student departure plus six years	Registry Manager	Moodle	Erase / Destroy
Pre / Post Subject Boards reports	Graduation or student departure plus six years	Registry Manager	One Drive / Share Point	Erase / Destroy
Lists of awards, pass / fail lists, qualifications	Issue of list plus ten years	Registry Manager	Network / One Drive / Share Point	Erase / Destroy

Data Category	Retention Period	Responsibility	Location	Action Required at End of Retention Period
Academic Misconduct, Appeals, Complaints and Discipline				
Records documenting the handling of informal complaints (not reaching formal stage)	Last action on case plus three years	Registry Manager	Student Information Management System / One Drive / SharePoint	Erase / Destroy
Records Documenting the handling of Formal Complaints, disciplinary proceedings and academic appeals	Last action on case plus six years	Registry Manager	Student Information Management System / One Drive / SharePoint	Erase / Destroy