



## Data Protection Policy

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### INTRODUCTION

1. New College of the Humanities (the College) is committed to protecting your personal data and informing you of your rights concerning that data.
2. The College needs to keep some personal data about its employees, prospective employees, students, prospective students and other people. The College processes information so that, for example, it can obey the law, admit students, teach and support students, and recruit and pay staff.
3. To comply with the Data Protection Act 1998 (the "Act") and the General Data Protection Regulation (GDPR), the College must collect and use personal data fairly, store it safely and not unlawfully disclose it to any other person.
4. To do this, the College must comply with the Data Protection Principles, which are set out in the Act. In summary, personal data must:
  - Be obtained and processed fairly and lawfully and not processed unless certain conditions are met.
  - Be obtained for a specified and lawful purpose and not processed in any manner incompatible with that purpose.
  - Be adequate, relevant and not excessive for that purpose.
  - Be accurate and kept up to date.
  - Not be kept for longer than is necessary for that purpose.
  - Be processed in accordance with the data subject's rights.
  - Be kept safe from unauthorised access, accidental loss or destruction.
  - Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.
5. One of the College's responsibilities as a Data Controller is to be transparent in our processing of your personal data and to tell you about the different ways in which we collect and use your personal data. The College will process your personal data in accordance with the General Data Protection Regulation 2018

(GDPR) and the Data Protection Act 1998 (DPA), and this privacy notice is issued in accordance with GDPR Articles 13 and 14.

6. The College may update its Privacy Notices at any time. You can find the current versions of the College's Privacy Notices below; please check back here regularly to review any changes.

### REGISTRATION

7. The College is registered as a Data Controller with the Information Commissioner's Office (ICO) under the DPA (registration number Z3136922).

### STATUS OF THIS POLICY

8. Employees and students are required, as a condition of employment or study, to abide by the College's regulations and policies. Failure to comply with this Policy may lead to disciplinary proceedings.

### CODE OF PRACTICE

9. In implementing this Policy, the College will be guided by the Jisc Data Protection Code of Practice for the HE and FE sectors published at [Jisc](#) (the "Jisc Code"). The Jisc Code is not mandatory, and if there is any conflict between this Policy and the Jisc Code, this Policy shall prevail.

### THE DATA CONTROLLER AND THE DESIGNATED DATA CONTROLLERS

10. The College itself is the Data Controller under DPA, and the Board of Directors is ultimately responsible for implementation. The Designated Data Controllers will deal with day-to-day matters.
11. The College's Designated Data Controller for students and applicants is the Registrar, and for all others is the Chief Operating Officer (COO).

### THE DATA PROTECTION OFFICER

12. The College has appointed a Data Protection Officer. Their postal address is:  
Data Protection Officer  
New College of the Humanities  
The Registry  
Bedford Square  
London  
WC1B 3HH

## **YOUR PERSONAL DATA & ITS PROCESSING**

13. The College defines "personal data" as information relating to a living and identifiable individual. Personal data can include "special categories of data", such as information about your racial or ethnic origin, religious or other beliefs, physical or mental health, criminal convictions and offences, the processing of which is subject to strict requirements.
14. "Processing" means any operation which we carry out using your personal data, for example obtaining, storing, transferring or deleting.
15. The College only process data for specified purposes and when it data protection law permits its processing. The details of each processing purpose and its legal basis are provided in each of the privacy notices listed below - please consult the one most relevant to your relationship to the College.

## **YOUR RIGHTS AS A DATA SUBJECT**

16. You have the following rights in relation to your personal data processed by us:

### **THE RIGHT TO BE INFORMED**

17. The College will ensure you have sufficient information to ensure that you understand how and why the College processes your personal data and that you know how to enforce your rights.
18. The College provides information in the form of privacy notices, which you can read online.

### **THE RIGHT OF ACCESS & THE RIGHT TO DATA PORTABILITY**

19. You have a right to see all the information the College holds about you. Where data is stored electronically in a structured form, such as in a database, you have a right to receive that data in a standard electronic format that allows you to supply that data to a third party - this is called "data portability".

### **THE RIGHT OF RECTIFICATION**

20. If the College holds data about you that is incorrect, you have the right to have it corrected.

### **THE RIGHT TO ERASURE**

21. You can ask the College to delete your data and, where this is appropriate, the College will take reasonable steps to do so.

### **THE RIGHT TO RESTRICT PROCESSING**

22. If you think there's a problem with the accuracy of the data the College holds about you, or the College is using data about you unlawfully, you can request that any current processing is suspended until a resolution is agreed.

### **THE RIGHT TO OBJECT**

23. You have a right to opt out of direct marketing. You have a right to object to how the College uses your data if the College does so on the basis of "legitimate interests" or "in the performance of a task in the public interest" or "exercise of official authority" (a privacy notice will clearly state to you if this is the case).

Unless the College can show a compelling case why its use of data is justified, the College must stop using your data in the way to which you have objected.

### **RIGHTS RELATED TO AUTOMATED DECISION MAKING INCLUDING PROFILING**

24. The College may use a computer programme, system or neural network to make decisions about you (for example, everyone that is on a particular course gets sent a specific letter) or to profile you. You have the right to ask for a human being to intervene on your behalf or to check a decision.

### **THE RIGHT TO WITHDRAW CONSENT**

25. If the College is relying on your consent to process your data, you may withdraw your consent at any time.

### **EXERCISING YOUR RIGHTS**

26. To request your information, please send a written request to the appropriate Designated Data Controller.
27. The request must include:
  - 27.1. The full name and address of the person making the request.
  - 27.2. If the Data Subject is a different person, that person's full name and address.
  - 27.3. Sufficient details to enable the College to identify the Data Subject's records, for example, the dates when a former student or employee was at the College.
  - 27.4. A description of the information requested, with as much detail as possible.
28. The request should either be handed personally to the Designated Data Controller or sent by recorded delivery or email. The College will need to see original proof of identity of the Data Subject and (if the person making the request is not the Data Subject) that person and evidence of the Data Subject having authorised the request.
29. The College will handle requests in accordance with the guidance provided by the Information Commissioner, aims to comply with requests promptly and will ensure that responses are provided within one month, as required by the GDPR.

### **QUERIES & COMPLAINTS**

30. For more information on your rights, if you wish to exercise any right, for any queries, you may have, or if you wish to make a complaint, please contact the Data Protection Officer.

### **COMPLAINT TO THE INFORMATION COMMISSIONER**

31. You have a right to complain to the Information Commissioner's Office (ICO) about the way in which the College processes your personal data. You can make a complaint via the ICO's website.

### **PRIVACY NOTICES**

32. Please consult the privacy notice that best fits your relationship with the College.

### DATA SECURITY

33. All members of staff are responsible for ensuring that any personal data that they hold is kept securely and not disclosed by any means, accidentally or otherwise, to any unauthorised third party. Unauthorised disclosure, including avoidable accidental disclosure, may constitute a disciplinary matter and may be gross misconduct in some cases.
34. Hard copies of personal data must be kept in a locked filing cabinet, drawer, or similar secure storage, on College premises. It is not sufficient to lock the room in which the data is kept.
35. Hard copies of assignments, including exam scripts, may be removed from the College for marking purposes.
36. Computerised personal data may only be held on the College's official designated data repositories. These are:
  - Highrise
  - Quercus
  - TurnItIn
  - PeopleHR
  - CELCAT and all products
  - Eaglepoint CRM
  - Hubspot
  - Mailchimp
  - Eventbrite
  - Zapier
  - Logiforms
  - Moodle
  - Google ecosystem (Google drive, Gmail and Google Calendar)
  - PaperCut
  - Active Directory and all associate programmes
37. Personal data may not be stored on a laptop, local hard drive, a network drive, a USB stick, CD or any other storage media unless the device is encrypted.

### DATA PROTECTION BREACHES

38. A Data Subject is any person whose personal data is held or processed by the College, including employees, students and applicants. All Data Subjects must:
  - 38.1. Check that information provided to the College is accurate and up to date.
  - 38.2. Update the College immediately when information changes, such as changes of address. Unless the Data Subject does so, the College is not responsible for errors.

### **DATA PROTECTION NOTICE**

39. If personal data is obtained directly from the Data Subjects themselves, a data protection notice must accompany any request for personal data, including the following information:
  - 39.1. The information that the College is the data controller.
  - 39.2. The purposes for which the data will be processed.
  - 39.3. Any further information necessary to make the processing fair, for example details of any third parties to whom the data might be disclosed.
  - 39.4. An opt-in or opt-out to marketing, if appropriate.
  - 39.5. A statement that the Data Subject is giving their consent for the processing of the data for the stated purposes to take place.

### **SENSITIVE INFORMATION**

40. The College has to process some information about health, criminal convictions, race, and trade union membership, for specific purposes such as safety or equal opportunities. Data subjects must be asked to give express consent for this. Offers of employment or student places may be withdrawn if an individual unreasonably refuses consent.

### **OTHER PROCESSING OF PERSONAL DATA**

41. If faculty or students need to hold or process personal data as part of their studies or research, they must notify the Registrar in advance and comply with guidelines that will be provided.
42. Staff and students may themselves hold or process personal data as part of their coursework, for personal or domestic purposes or otherwise. The College is not the Data Controller in such cases, and the individual concerned is entirely responsible for such disclosures. Such data is not covered by this Policy.

### **TRANSFER OF DATA**

43. Personal data may need to be transferred to third parties in some cases, and in that case, the College will be guided by the Jisc Code.
44. Data may also be disclosed to third parties without the consent of the Data Subject when required by law and in certain other limited circumstances. If the need for this arises, the College will be guided by the Jisc Code.

### **ASSESSMENT RESULTS**

45. Students will typically receive information about their results for both coursework and examinations routinely. Examination and coursework scripts themselves are

exempt from the subject access rules. The Act provides for extended response times for other assessment-related requests.

### COLLEGE INFORMATION

46. The names and other personal data relating to staff and directors of the College will be published on the College website if required by law. Work-related information about College staff may be published on the College website.

### DATA RETENTION AND DESTRUCTION

47. The College must retain some student and staff personal data after they leave the College either because the law requires it or for other reasons, e.g. to provide transcripts and references or to keep tax records. Each type of data will be kept for a set period, which is defined in the College's Data Retention Schedule.
48. When it is time to destroy records, hard copies will be mechanically destroyed by incineration, shredding or a similar permanent method (which may be subcontracted) and electronic records will be permanently wiped by an appropriate irreversible method.

### DATA RETENTION SCHEDULE

#### INTRODUCTION

49. The College will only keep your personal data for as long as necessary to fulfil the purposes for which it was collected.
50. To determine the appropriate retention period for personal data, the College considers the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which the College processes your personal data and whether it can achieve those purposes through other means, and the applicable legal requirements.
51. This data retention schedule describes the time periods for which records should be retained by the College. The retention periods given in this document are taken mainly from the JISC Record Retention Schedule which can be viewed [here](#).
52. At the end of the retention period records should be destroyed securely or deleted. Where the retention period is "permanent", the record will never be destroyed.
53. Only one copy of each record needs to be kept for the full duration of the retention period. Duplicate and additional copies of records should be destroyed as soon as they are no longer of operational use.
54. The Records Management British Standard BS ISO 15489 defines a record as "Information created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or the transaction of business". All records created and stored by the College, both in paper and electronic form and including data held in databases are subject to retention policies. Where a record contains personal identifying information the retention periods stated in this schedule are mandatory requirements and must be followed

unless the Information Governance Office has approved a specific exception. Entries marked with an \* indicate a record that is likely to contain personally identifying information, this may not be exhaustive.

### **UNSTRUCTURED INFORMATION SYSTEMS**

55. Email should not be used for storing any College records. Emails that constitute a record which needs to be retained, including those containing personally identifying information, must be stored in a filing system appropriate to their level of confidentiality or criticality.
56. Shared drives or other unstructured information storage solutions (including cloud-based storage) used to store any College records should be managed in accordance with this schedule, however where those records contain personally identifying information the retention periods must be followed.

### **STRUCTURED SYSTEMS STORING PERSONALLY IDENTIFYING INFORMATION**

57. All structured information management systems that store records containing personal identifying information must be managed in accordance with this schedule. These information management systems must have a deletion or archival capability and, where appropriate, be able to identify a subset of the original information for continued retention.

### **IMPORTANT NOTES**

58. College policy and strategy documents should be retained for 10 years or 5 years, depending on importance, and then referred to the College archives.
59. Audits and reviews of performance against plans and strategies should be retained for 10 years after the current academic year and then be offered to the College archives.
60. Contracts and customer service agreements should be retained for 6 years after the termination of the contract or agreement, and then be offered to the College archives.
61. Original financial records should be retained for 6 years after the current financial year to ensure compliance with the Limitation Act 1980 and HM Customs & Excise Notice 700/21: Keeping [VAT] records and accounts.
62. Publications and promotional materials should be kept while current, and then a copy offered to the College archives for review.
63. Individual student files should be kept for 6 years after the student's relationship with the College has ended. This is to ensure compliance with the Limitation Act 1980 and is in line with the principles set out in data protection law. Only essential records of students should be kept for more extended periods: Name, dates of relationship with the College and final award classification. Also, a full record of courses taken and the marks for these should be kept for at least 40 years for each student to construct student transcripts.



Description of Record	Retention Period	Legal Citation
<b>Teaching</b>		
Teaching strategy and policy	Superseded + 10 years	
Teaching procedure	Superseded + 5 years	
Development of internal quality assurance processes	Retain while current	
Conduct and results of internal and external Quality reviews	Current academic year + 5 years	
Curriculum development	Superseded + 10 years	
Curriculum reviews	Superseded + 10 years	
Statistics (student numbers etc.)	Current academic year + 5 years	
Taught programme development	Life of programme + 10 years	
Reviews, reports and feedback on taught programmes	Current academic year + 5 years	
Taught course development and teaching materials	Life of course	
Taught course assessments, development and final versions	Life of course	
Assessment marks, including appeals and mitigating circumstances data*	Current academic year + 6 years (N.B. See section on individual student records below)	Limitation Act 1980
<b>Student administration</b>		
Student administration strategy and policy documents	Superseded + 10 years	
Student administration strategy audits and reviews	Superseded + 10 years	
Student recruitment campaigns	Current academic year + 5 years	
Admission criteria	Superseded + 10 years	
Clearing process administration	Current academic year + 1 year	
Student registration summaries and analyses	Current academic year + 6 years	

Description of Record	Retention Period	Legal Citation
Student induction programme design	Superseded + 5 years	
Records documenting the handling of applications for admission: unsuccessful applications	End of contact with applicant + 1 year.	
Student photographs (Individual or groups)*	Current academic year + 10 years, or retained and disposed of in accordance with terms of collection.	
<b>Examinations and Assessments</b>		
Examination rules and procedures	Superseded + 10 years	
Selection and appointment of external examiners*	Termination of appointment+ 10 years	
Selection and appointment of examination invigilators*	Current academic year + 1 year	
Examination administration (timetabling, collation, attendance etc.)	Current academic year + 3 years	
Pass / award lists*	Permanent	
Award ceremony administration	Completion + 1 year	
<b>Student relations</b>		
Staff / student liaison committees	Life of committee + 3 years	
Student surveys	Completion + 5 years	
<b>Student Support Services</b>		
Support services strategy and policy documents	Superseded + 10 years	
Support services strategy reports and audit	Current academic year + 10 years	
Student support services proposals and development	Life of service	
Support services performance, audit and reviews	Current academic year + 5 years	
<b>Alumni Relations</b>		
Strategy and policy documents	Superseded + 5 years	
Strategy and policy	Current year + 5 years	

Description of Record	Retention Period	Legal Citation
review and audit		
Personal data on alumni*	Retain while current	
Alumni surveys	Completion + 3 years	
Individual survey responses (*if they identify individuals)	Completion of survey	
Complaints*	Last action + 6 years	
<b>Fundraising</b>		
Strategy and policy documents	Superseded + 5 years	
Strategy and policy review and audit	Current year + 5 years	
Fundraising campaigns	Last action + 5 years	
Individual responses to campaigns (*if they identify individuals)	Completion of campaign + 5 years	
<b>Strategic planning &amp; performance management</b>		
Strategy and policy documents	Superseded + 10 years	
Strategy and policy review and audit	Current year + 10 years	
<b>Governance</b>		
Records documenting the establishment and development of governance structure	Life of institution	
Appointments to governing body*	Termination of appointment + 6 years	
Governing body minutes, agendas and reports	Current year + 50 years	
Establishment and terms of reference of executive committees	Life of committee	
Executive Committee minutes, agendas and reports	Current year + 50 years	
Appointment and designation of institution's senior officers*	Termination of appointment + 5 years	
Faculty committee minutes, agendas and reports	Current year + 10 years	

Description of Record	Retention Period	Legal Citation
Records recording the handling of individual requests under the Freedom of Information Act, GDPR and DPA	Current year + 6 years	
Documents provided to individuals under GDPR data subject rights requests	Current year + 3 years	
<b>Risk Management</b>		
Strategy and policy documents	Superseded + 5 years	
Strategy and policy review and audit	Current year + 5 years	
Records documenting identified risks and risk assessments	Superseded + 3 years	
Disaster response and recovery plans	Superseded + 1 year	
<b>Quality Management</b>		
Strategy and policy documents	Superseded + 5 years	
Strategy and policy review and audit	Current year + 5 years	
Quality audits and resultant actions	Completion + 3 years	
Attainment and maintenance of accreditations	Termination of accreditation + 1 year	
<b>Audit</b>		
Strategy and policy documents	Superseded + 5 years	
Strategy and policy review and audit	Current year + 5 years	
Audits and resultant actions	Completion + 5 years	
<b>Legal Affairs</b>		
Strategy and policy documents	Superseded + 5 years	
Strategy and policy review and audit	Current year + 5 years	
Agreements and contracts under seal and	Termination of contract+ 12 years	Limitation Act 1980

Description of Record	Retention Period	Legal Citation
related documents		
Agreements and contracts and related documents	Termination of contract+ 6 years	Limitation Act 1980
Legal support and representation related to claims against the College which do not proceed to litigation or agreement*	Settlement or withdrawal of claim + 6 years	Limitation Act 1980
Litigation leading to legal precedent*	Life of the College	Limitation Act 1980
Litigation not setting precedent*	Settlement + 6 years	Limitation Act 1980
Legal advice to College re: legal framework, operations, governance responsibilities, relationship with government and	Life of the College	
HE regulators, industrial relations and H & S and environment	Superseded + 6 years	
Other Legal advice to the College	Superseded + 6 years	
<b>HE Regulator Relations</b>		
Strategy and policy documents	Superseded + 5 years	
Strategy and policy review and audit	Current year + 5 years	
Requests for information from HE regulators and responses	Last action + 1 year	
Formal HE surveys and responses	Last action + 1 year	
HE regulator reviews of College and responses	Last action + 5 years	
<b>Health &amp; Safety Management</b>		
Strategy and policy documents, implementation plans, documents relating to development of strategy and policy, monitoring, auditing and review	Superseded + 50 years	

Description of Record	Retention Period	Legal Citation
processes		
Formation and terms of reference of health and safety committees, proceedings and decisions of committees	Life of committee + 50 years	Safety Representatives & Safety Committee Regulations 1977
Consultations and communications with employee safety representatives	Superseded + 50 years	Safety Representatives & Safety Committee Regulations 1977
Health and Safety training	End of employment + 5 years (unless training relates to exposure to hazardous substances)	Management of Health & Safety at Work Regulations 1999
Risk assessments (including control measures and action)	Period of relevance + 5 years (unless related to exposure to hazardous substances)	Management of Health & Safety at Work Regulations 1999
Health and safety inspections	Current year + 5 years	
Occupational health records including pre-employment screening*	Termination of employment + 40 years	
Records of notification of accidents to enforcing authorities (under RIDDOR)*  For further specific health and safety record retention periods see relevant legislation, including that relating to exposure to specific substances, fire wardens and first aiders	Date of known injury + 4 years	
<b>Emergency planning</b>		
Arrangements with external emergency services.	Review of arrangements + 5 years	Fire Precautions; (Workplace) Regulations 1997 The Management of Health and Safety at Work Regulations 1999
<b>Security Management</b>		
Security inspections	Whilst current	
Property access controls (e.g. DoorFlow & key	Creation + 2 years	

Description of Record	Retention Period	Legal Citation
registers)		
Security pass lists*	Expiry of pass + 1 year	
Routine security surveillance	Creation + 1 month	
Security breaches	Last action + 1 year	
<b>Finance</b>		
Strategy and policy documents	Superseded + 10 years	
Strategy and policy review and audit	Current year + 10 years	
Financial audits	Last action + 6 years	
Issue and processing of invoices	Current financial year + 6 years	
Expenses*	Current financial year + 6 years	
Petty cash	Current financial year + 6 years	
Preparation of annual accounts	Current financial year + 6 years	Taxes Management Act 1970
Financial records relating to research grants and contracts.* *Examples include financial transaction and budget reports, financial reconciliations, claims to funders, PI or other approvals relating to financial reports, budget changes or claims.	Closure of project account + 6 years	Limitation Act 1980
ERDF project funding documents and project papers	Current financial year + 15 years	
Scholarship & bursary funds	Current financial year + 6 years	Limitation Act 1980
Tax returns	Current tax year + 6 years	
Bank account administration	Closure of account + 6 years	
Standing orders, direct debits	Life of instruction + 6 years	
Capital assets value	Current financial year + 6 years	
<b>Payroll</b>		
Non statutory deductions authorisation*	Current tax year + 6 years	Limitation Act 1980

Description of Record	Retention Period	Legal Citation
Payroll payments to employees*	Current tax year + 6 years	Taxes Management Act 1970. Limitation Act 1980.  Income Tax (Employment) Regulations 1993. National Minimum Wage Regulations 1998
Sick pay*	Current tax year + 3 years	Statutory Sick Pay (General) Regulations 1982
Maternity pay*	Current tax year + 3 years	Statutory Maternity Pay (General) Regulations 1986
Pension contributions *	Termination of employment + 75 years	
Redundancy payment calculations, refunds & notification to Secretary of State	Redundancy + 6 years	
<b>Personnel</b>		
Strategy and policy documents	Superseded + 10 years	
Strategy and policy review and audit	Current year + 10 years	
Management succession plans	Superseded + 5 years	
Job specification development	Superseded + 5 years	
Recruitment authorisation	Current year + 1 year	
Vacancies advertising	Completion of appointment + 6 months	Sex Discrimination Act 1975, Race Relations Act 1976, Disability Discrimination Act 1995
Unsuccessful employment applications*	Completion of appointment + 6 months	Sex Discrimination Act 1975, Race Relations Act 1976, Disability Discrimination Act 1995
Successful applications*	Termination of employment + 6 years	Sex Discrimination Act 1975, Race Relations Act 1976, Disability Discrimination Act



Description of Record	Retention Period	Legal Citation
		1995
Successful applications supporting (references etc)*	Termination of employment	
Statistical analyses of applications	Current year + 5 years	
Unsolicited applications*	Last action + 1 year	
Induction programmes	Current year + 5 years	
Workforce training*	Current year / completion of programme+ 5 years	
Performance assessment (such as probation reviews, PDR records etc.)*	Current year + 6 years	
Contracts of employment*	Termination of employment + 6 years	Limitation Act 1980
Terms and conditions changes*	Termination of employment + 6 years	Limitation Act 1980
Disciplinary proceedings*	Closure of case + 6 years	
Sickness absence*	Termination of employment + 40 years	Social Security Contributions and Benefits Act 1992, Statutory Sick Pay for Employers CA30
Statutory leave*	Termination of employment + 6 years	Maternity and Parental Leave Regulations 1999
Pre employment health screening*	Termination of employment + 6 years	Limitation Act 1980
Major injuries / accidents*	Termination of employment + 40 years	Limitation Act 1980
Termination of employment*	Termination of employment + 6 years	Limitation Act 1980
References provided*	Provision of reference + 1 year	
Remuneration structure	Current year + 10 years	
Pay reviews	Current year + 5 years	
Hours monitoring*	Date of record + 2 years	Working Time Regulations 1998 (SI 1998/1833)
Workforce surveys design	Completion + 5 years	
Individual	Completion of analysis	

Description of Record	Retention Period	Legal Citation
responses (*if they identify individuals)		
Summary results of surveys	Completion + 5 years	
<b>Information Technology</b>		
Strategy and policy documents	Superseded + 5 years	
Strategy and policy review and audit	Current year + 5 years	
IT systems management	Decommissioning + 5 years	
Software licences management	Whilst current	
ICT security arrangements	Decommissioning of system + 5 years	
User accounts*	Indefinitely suspended at termination of employment + 6 months	
System monitoring	Current year + 1 year	
Security breaches	Last action + 1 year	
<b>Admissions</b>		
School contacts	Last contact + 10 years	
School contacts opted out of marketing	Unsubscribe + 2 years	
Prospective student records	Presumed date of entry +7 years	
Unsuccessful applicant records	Presumed date of entry +7 years	
<b>Student &amp; Academic Services</b>		
Student	Graduation + 10 years	
Formative essays	Graduation + 6 months	
Summative essays	Indefinite	References
Collections reports	Indefinite	References
Examination scripts	Release of marks + 12 months	Time limitations on appeals
Plagiarism & academic malpractice	Last action on case + 6 years	

Description of Record	Retention Period	Legal Citation
Health records including medical evidence of disability, disclosure form, and educational psychologists' reports.	Graduation + 12 month	Time limitations on appeals. May be required by Student & Academic Services during the student's time at NCH, time limitations on appeals
Transcripts (marks)	Indefinite	References
Student Complaints	Last action on case + six years	JISC recommendation: 1980 c. 58 s 5
Student Appeals	Last action on case + six years	JISC recommendation: 1980 c. 58 s 5
Timetabling	Graduation + three years	
Attendance data	Graduation + three years	
<b>Tier 4 students</b>		
Copy of each sponsored migrant's current passport pages showing all personal identity details including biometric details, leave stamps, or immigration status document including their period of leave to remain (permission to stay) in the UK. This must show the migrant's entitlement to study with a licensed sponsor in the UK. In the absence of an entry stamp, other evidence such as the travel ticket to the UK or boarding card should be kept.	All documents must be kept for whichever is the shorter period of either: <ul style="list-style-type: none"> <li>1 year from the date the College ends its sponsorship of the migrant</li> <li>If the migrant is no longer sponsored by the College, the point at which a compliance officer has examined and approved them.</li> </ul>	Sponsor guidance appendix A
Copy of the migrant's biometric residence permit (BRP).	All documents must be kept for whichever is the shorter period of either: <ul style="list-style-type: none"> <li>1 year from the date the College ends its sponsorship of the migrant</li> <li>If the migrant is no longer sponsored by the College, the point at which a compliance officer has examined and approved them.</li> </ul>	Sponsor guidance appendix D
Record of the migrant's	All documents must be kept for	Sponsor guidance

Description of Record	Retention Period	Legal Citation
absence/attendance, this may be kept either electronically or manually	whichever is the shorter period of either: <ul style="list-style-type: none"> <li>• 1 year from the date the College ends its sponsorship of the migrant</li> <li>• If the migrant is no longer sponsored by the College, the point at which a compliance officer has examined and approved them.</li> </ul>	appendix D
A history of the migrant's contact details to include UK residential address, telephone number and mobile telephone number. This must be updated regularly.	All documents must be kept for whichever is the shorter period of either: <ul style="list-style-type: none"> <li>• 1 year from the date the College ends its sponsorship of the migrant.</li> <li>• If the migrant is no longer sponsored by the College, the point at which a compliance officer has examined and approved them.</li> </ul>	Sponsor guidance appendix D
Copies or originals where possible of any evidence assessed by the College as part of the process of making an offer to the migrant, this could be copies of references, examination certificates.	All documents must be kept for whichever is the shorter period of either: <ul style="list-style-type: none"> <li>• 1 year from the date you end your sponsorship of the migrant.</li> <li>• If the migrant is no longer sponsored by the College, the point at which a compliance officer has examined and approved them.</li> </ul>	Sponsor guidance appendix D
All documents provided as part of the College's application to become a licensed sponsor	The duration of the period covered by the College's license	Sponsor guidance appendix D

Title	Data Protection Policy	Author	Director of Marketing
Location	Academic Handbook	Approved by	Executive Committee
Version	2.7	Last updated	May 2018
Publication date	25 May 2018	Review date	May 2019
Related policies	Staff Handbook; Privacy Notices		
External Reference Point(s)	General Data Protection Regulation 2018; Information Commissioner's Office; Jisc Data Protection Code of Practice; Records Management British Standard BS ISO 15489; Information Governance Office; Limitation Act 1980; HM Customs & Excise Notice 700/21: Keeping (VAT) records and accounts; UK Quality Code: Monitoring and Evaluation		