

Contents

1	OVERVIEW	1
2	ABOUT THIS POLICY.....	1
3	DATA RETENTION PERIODS.....	2
4	RETENTION PERIODS FOR DIFFERENT CATEGORIES OF DATA.....	2
5	DATA SUBJECT RIGHTS	4
6	LEGAL HOLDS/INVESTIGATIONS.....	5
7	CHANGES TO THIS POLICY.....	5

1 OVERVIEW

- 1.1 Shrewsbury College (the "**College**") must, in respect of its processing of personal data, comply with the Data Protection Act 2018, as amended by the Data Protection Act 2025, the UK General Data Protection Regulation, 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 it is necessary for the purpose for which it was collected, or where there is a lawful basis to retain it. Once the College no longer needs personal data, it will be securely deleted or anonymised in line with this Policy. 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 Employees**").
- 1.5 All College Employees with access to personal data must comply with this Retention Policy.
- 1.6 Please read this Retention Policy carefully. All College Employees must comply with it at all times. If you have any queries regarding this Retention Policy, please consult your line 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.
- 1.7 College Employees will be referred to a copy of this Policy when they start, as part of their College Induction, and may receive periodic revisions of this Policy. This Policy does not form part of the contract of employment and the College reserves the right to change this Policy at any time. All College Employees are obliged to comply with this Policy at all times.

2 ABOUT THIS POLICY

- 2.1 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. The College will maintain appropriate records to demonstrate that retention and deletion decisions are applied consistently and in line with Data Protection Laws.

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. The table below 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 Employees considers that a particular piece of personal data needs to be retained for a different period than the period set out in this policy, this must be agreed with the Data Protection Officer and recorded with a clear justification.

4 RETENTION PERIODS FOR DIFFERENT CATEGORIES OF DATA

The College will apply a standard data retention period of 6 academic years, including the year of collection, from the final year of engagement with the College.

This reflects the typical period required for operational, funding, and audit purposes. Where a different retention period is required, exceptions are set out below.

All electronic data is securely deleted using appropriate technical controls to ensure it cannot be recovered. Where equipment is disposed of, this is carried out in accordance with Waste Electrical and Electronic Equipment (WEEE) Regulations. All manual records are securely destroyed by an approved third-party provider, with appropriate assurances in place.

Type of data	When will the College delete it (if manual)?	When will the College delete it (if electronic)
Student ILR data required to support ESF match funding requirements	6 years from date study ended, or 31 st December 2030	6 years from date study ended, or 31 st December 2030

Type of data	When will the College delete it (if manual)?	When will the College delete it (if electronic)
College Employee Human Resource files	60 years following end of contract of employment.	60 years following end of contract of employment.
College Health & Safety Records	12 months, then scanned to electronic copy and original securely destroyed.	60 years from year of creation.
Records of disclosed student criminal convictions; including any decision to enrol to a course	31 st October in the academic year following end of course.	31 st October in the academic year following end of course.
Details of Applicants that did not progress to enrolment	6 academic years, including year of collection.	6 academic years, including year of collection.
Qualitative data stored in pastoral systems, e.g. ProMonitor.	6 academic years, including year of collection.	6 academic years, including year of collection.
Student assignment submissions/work portfolios	Up to 3 academic years, including year of collection.	Up to 4 academic years, including year of collection.
Student Safeguarding Records	6 academic years, including year of collection.	6 academic years, including year of collection.
Electronic Visitors Sign-in Sheets	12 Months	N/A
Data relating to unsuccessful Job Applications	3 years from application date.	3 years from application date.
Recordings of live teaching/assessment activities including teacher and student images or voices	N/A	At the end date of the relevant course

Type of data	When will the College delete it (if manual)?	When will the College delete it (if electronic)
Recordings of teaching activities including only a teacher, used for broadcast purposes in the future.	N/A	Retained for up to 5 academic years to reuse with other students.
Recordings of prospective student interviews	N/A	At the end of the enrolment process; normally 30 th Sept in the relevant academic year
Recordings of applicant interviews for employment at the college	N/A	At the conclusion of the appointment process
CCTV Footage	N/A	Up to 90 days from the point of recording, unless specifically referenced in a current procedure, e.g. Student Conduct, in which case following the conclusion of that proceeding.

5 DATA SUBJECT RIGHTS

The College will also take into account data subject rights, including the right to erasure and restriction of processing. Where such rights apply, retention or deletion of data will be reviewed on a case-by-case basis in line with Data Protection Laws.

6 LEGAL HOLDS/INVESTIGATIONS

Where data is required for an ongoing investigation, complaint, legal claim, or regulatory requirement, deletion may be paused until the matter is concluded.

7 CHANGES TO THIS POLICY

This Policy will be reviewed periodically and updated to reflect changes in legislation, guidance, and College practices.

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