



UK COLLEGE
OF BUSINESS AND COMPUTING

Data Retention Policy (Company and Staff)

Reviewed by	AW
Reviewed on	March 2023
Approved by	DPO Oversight Group
Approved	
Next reviewed by	March 2024
Version	V2

Data Retention Policy Staff

1. Introduction

Record management is essential to the day to day running of a business and adhering to legal obligations. The College is committed to establishing and continually developing a robust record management to ensure that the college is retaining important data and discarding data that is no longer required appropriately and within its obligations under the Data Protection legislation and GDPR. Having a robust records management process ensures that the college can disclose the requirements to data subjects and under the freedom of information act (2000).

This Policy should be read alongside the Colleges Data Protection/ GDPR policy. It should also be read along with Student data Retention Policy.

2. Purpose

The Purpose of this policy is to ensure that records and documents held by UK College of Business and computing (UKCBC) are adequately used, processed and maintained but also that they are discarded appropriately once they are no longer required. This policy is also the purpose of aiding employees of UKCBC in their understanding of what their obligations are in retaining documents including but not limited to e-mails, text files, Web files , sound and Video Files.

3. Records

The term records can be defined as any document, in any format including paper, electronic or video which is created, received or maintained by UKCBC and allows you to conduct business.

Records are an essential part of any organisation and contain unique and valuable information. They can be provided in several formats and can be used for audit trails and evidence; therefore, it is important that all types are managed appropriately especially in terms of storage, accessibility, and disposal.

4. Staff responsibilities

The department heads have a responsibility to manage all the Records which are generated within their departments and from their activities.

The DPO oversight group have an overall responsibility to ensure the integrity of both the Staff and Students records, this group will meet regularly to discuss and review the retention records and the Data retention schedule.

All staff that receive, create, amend, or use data have a responsibility. Their responsibility is to ensure any record in their possession is not kept permanently, that it is not shared unnecessarily and that it is disposed of correctly and in accordance with the Data retention Schedule. In addition, all staff should be aware of what records they are creating through their work and ensure that they are aware how to securely dispose of the records including emails.

5. Retention Schedule

The purpose of the Retention scheduled is

- Improve the effectiveness of working practices in turn enabling a more streamlined retrieval of records.
- Avoidance of premature deleting of records or maintaining records unnecessarily
- Minimising duplication records
- Reducing storage of records

Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention, and disposal schedule for physical records of UKCBC and the retention and disposal of electronic documents.

This schedule provides guidance on common records kept, maintained or generated by UKCBC and the schedule should be viewed as a guide in determining the retention periods for specific records. UKCBC does not keep all records on a permanent basis, only records which have evidential, historical, legal, business or compliance importance would be retained permanently or for a specified length of time (as highlighted in the schedule).

UKCBC will not maintain multiple copies of records, and hard copies which include confidential or personal data will be securely shredded.

6. Suspension of Record disposal

There are certain occasions when information needs to be preserved beyond any limits set out in the Policy. The Policy must be suspended relating to a specific customer or document and the information retained beyond the period specified in the UKCBC's

Data Retention Schedule in the following circumstances:

- Legal proceedings or a regulatory or similar investigation or obligation to produce information are known to be likely, threatened, or actual.
- A crime is suspected or detected.
- Information is relevant to a company in liquidation or receivership, where a debt is due to UKCBC.
- Information is considered by the owning unit to be of potential historical importance, and this has been confirmed by the DPO oversight group or senior management team

In the case of possible or actual legal proceedings, investigations or crimes occurring, the type of information that needs to be retained relates to any that will help or harm UKCBC or the other side's case or liability or amount involved.

If there is any doubt over whether legal proceedings, an investigation or a crime could occur, or what information is relevant or material in these circumstances, the DPO oversight group should be contacted, and legal advice sought.

7. Security of personal information

- UKCBC will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal
- information.
- UKCBC will store all personal information on our secure (password- and firewall-protected) servers.
- All electronic financial transactions entered into through our website will be protected by encryption technology.
- All electronic financial transactions entered into through our website that are handled by third party sources will be protected by the
- security measures put in place by the bank or organisation in question.
- The Client should acknowledge that the transmission of information over the internet is inherently insecure, and that UKCBC cannot guarantee the security of data sent over the internet.
- The Client will be responsible for keeping their Username and Password used for accessing.

8. Amendments

UKCBC may be update the policy from time to time and will publish the new version.

9. Applicability

This policy applies to all staff records created, maintained or disposed of during the course of UKCBC's operations. These records included both original copies and any copies

Retention Schedules and additional retention information

Record Description	Responsibility	Legal Reference	Retention	Archive	Classification	Notes
Major reconstruction – plan, consultation documentation, meeting records	Human Resources		4 Years		Restricted	Retain locally for 4 years then to College Archive
HR Policies, codes of Practice, forms and Procedures						
Includes Dignity at work Policy, Flexible working time policy, Confidentiality policy, Retirement Procedure	Human Resources		7 years +	No	Internal	Publish on the HR Website Also see Equality and Diversity policy
Summary of harmonized terms and conditions of employment	Human Resources		7 years +	Yes	Internal	Publish on the HR Website
Industrial Relations						
Records of regular trade union liaison meetings and of joint groups	Human Resources		7 years +	Yes	Restricted	
Staff Training and Development						
Annual programme of Training Courses	Organisation Development		1 years	No	External	
Record of staff attendance at internal training courses	Organisation Development	GDPR	5 years	No	Restricted	
Job Evaluation						
Job evaluation Criteria- grading Scheme	Human Resources		5 years	No	Restricted	While Scheme is active -7 years
Job Description and Job evaluation reports	Human Resources		5 Years	No	Restricted	Retain permanently as part of Core staff Records Destroy local copies on termination of employment
Staff Administration						
College personnel Files. Including <ul style="list-style-type: none"> • Application /CV • Reference 	Human Resources	GDPR	7 years +	Yes	Highly Restricted	Retain Permanently as part of core staff records

<ul style="list-style-type: none"> • Letter of Appointment • Contract of employment • Terms and Conditions • Job Description and personal Specification • Staff registration Form • Pension opt in/out form • Probation Document • Record of previous service • Variation of Hours • Extension of Contract • Promotion, regrading, secondment, etc • Letter of resignation or termination of Contract • Notification of staff leaving from 						<p>Transfer paper files to corporate record Management</p> <p>Retain information on the HRIS database</p>
Departmental Personnel Files	Line Manager	GDPR	7 years +	No	Highly Restricted	Retain until termination of employment then transfer to HR
Records of Contractual holiday entitlement	Departments	GDPR	Up to 3 Years	No	Highly Restricted	Current years + 1 years
Record of special leave, i.e. compassionate leave, study leave, etc.	Departments	GDPR	7 years +	No	Highly Restricted	Retain until termination of employment +1 year
Record of statutory leave entitlement, i.e. parental leave or leave taken for dependents	Department	GDPR	7 Years +	No	Highly Restricted	Retain until termination of employment +6 year
Recruitment						
Authorisation to recruit form	Human Resources		7 years +		Restricted	Retain permanently as part of core staff records.

						Destroy local copies on termination of employment
Advert, recruitment agency brief	Department		Up to 3 years		External	Vacancy filled + 6 months
Unsuccessful application forms and CV's	Human Resources	GDPR	1 Years		Restricted	Vacancy filled +6 months
Successful Application form and CV	Human Resources/ departments	GDPR			Restricted	Retain permanently as part of core staff records Destroy local copies on termination of employment.
Shortlisted notes, interview notes and test results	Human Resources/ department	GDPR				Vacancy filled +6 months
Performance						
Annual Appraisal records	Line Managers/ HR	GDPR	4 Years	No	Restricted	
Appraisal Summary forms	Line Managers/ HR	GDPR	4 Years	No	Restricted	
Complaints, grievance, disciplinary						
Tribunal Case files	Human Resources	Limitation Act 1980 GDPR	7 years +	Yes	Highly Restricted	Retain locally until closure of case +6 years then transfer to the college Archive
Grievance records	Human Resources	Limitation Act 1980 GDPR	7 years +	No	Highly Restricted	Closure of case +6 years
Capability and Disciplinary records	Human Resources	Limitation Act 1980 GDPR	7 years +	No	Highly Restricted	Closure of case +6 years
Staff Health Surveillance						
Pre-employment Health Declaration	Human Resources	GDPR	7 years +	Yes	Highly Restricted	Retain permanently as part of core staff records
Medical records and details of assessment	Occupational Health	GDPR	7 years +	No	Highly Restricted	Retain until termination of employment
Occupational Health Reports	Human Resources/De partments	Limitation Act 1980 GDPR	7 years +	No	Highly Restricted	Termination of employment +6 years.
Sickness records unrelated to industrial injury	Department	Limitation Act 1980 GDPR	7 years +	No	Highly Restricted	Termination of employment + 6 years

Records of Major injuries arising from workplace accidents	Human Resources	Limitation Act 1980 GDPR	7 years +	No	Highly Restricted	Retain until termination of employment + 6 years
Medical records under the Ionizing radiation (Medical) Exposure Regulations 2000	Appointed Doctor	Ionizing radiation (Medical) Exposure Regulations 2000 GDPR	7 years +	No	Highly Restricted	Retain until termination of employment + 6 years
Salary and Payments						
Statutory maternity pay calculations. Certificates and medical evidence	Human Resources/Finance and planning	GDPR	7 years +	No	Highly Restricted	HR will retain until termination of employment + 6 months Finance and Planning retain for 1 years
Statutory Sick pay calculations and certificates	Finance and Planning	GDPR	7 years +	No	Highly Restricted	termination of employment + 6 months
Salary records – calculations, refunds	Finance and Planning	GDPR	7 years +	Yes	Highly Restricted	
Redundancy records-calculations and refunds		GDPR	7 years +	No	Highly Restricted	Retain permanently as part of core staff records
Counselling and Support						
Staff case files	Diversity and Inclusion	GDPR	7 years +	No	Highly Restricted	Retain from last action +6 years
Temporary Staff						
Timesheets for Temporary Staff	Department /HR	Working time regulations	2 years	No	Restricted	

*At the end of the specified retention period, departments are required to record what has happened to a document (retained for archival value or destroyed) and when the action happened.

Records which may be routinely destroyed.

As a rule, the following types of records have no significant operational, informational or evidential value. They can therefore be destroyed as soon as they have served their primary purpose.

Examples of this kind of data

- Announcements and notices of meetings and other events, and notifications of acceptance or apologies;

- Requests for stock information such as maps and travel directions, brochures etc;
- Requests for, and confirmations of, reservations for internal services (e.g. meeting rooms, car parking spaces, pool cars) where no internal charges are made;
- Requests for, and confirmations of, reservations with third parties (e.g. travel, hotel accommodation, restaurants) when invoices have been received;
- Transmission documents: letters, FAX cover sheets, e-mail messages, routing slips, compliments slips and similar items which accompany documents but do not add any value to them;
- Message slips;
- Superseded address lists, distribution lists etc.;
- Duplicate documents such as: 'CC' and 'FYI' copies;
- Unaltered drafts;
- 'Snapshot' printouts or extracts from databases ;
- 'Day Files' (chronological copies of correspondence);
- Personal diaries, address books etc.;
- Working papers, where the results have been written into an official document and which are not required to support it;
- Stocks of in-house publications which are obsolete, superseded, or otherwise useless e.g. magazines, marketing materials,
- prospectuses, catalogues, manuals, directories, forms, and other material produced for wide distribution.

The Schedule is organised as follows:

Accounting and Finance

Record Type	Retention Period
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Annual Plans and Budgets	2 years
Bank Statements and Canceled Checks	7 years
Employee Expense Reports	7 years
Interim Financial Statements	7 years
Credit card records (documents showing customer credit card number)	2 years

Credit card record retention and destruction

A credit card may be used to pay for UKCBC products and services: The UKCBC System and all future additions to this system.

All records showing customer bank details must be locked in a desk drawer or a file cabinet when not in immediate use by staff.

If it is determined that information on a document, which contains credit card information, is necessary for retention beyond 2 years, then the credit card number will be cut out of the document.

Correspondence and internal communications

General Principle: Most correspondence and internal communications should be retained for the same period as the document to which they relate to or support. For example, a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file.

Correspondence or communications that do not relate to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:

1. Those relating to routine matters and having no significant, lasting consequences should be discarded within two years.

Some examples include:

- Routine letters and notes that require no acknowledgment or follow up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.
- Form letters that require no follow up.
- Letters of general inquiry and replies that complete a cycle of correspondence.
- Letters or complaints requesting specific action that have no further value after changes are made or action taken (such as name or address change).
- Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.
- Chronological correspondence files.

Please note that copies of interoffice correspondence and documents where a copy will be in the originating department file should be read and destroyed, unless that information provides reference to or direction to other documents and must be kept for project Audit purposes.

2. Those relating to non-routine matters or having significant lasting consequences should generally be retained permanently.

Retaining personal information

1. This Section sets out the data retention policies and procedure of UKCBC, which are designed to help ensure compliance with legal obligations in relation to the retention and deletion of personal information
2. Personal information that is processed by UKCBC for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Without prejudice to point 2 (above) UKCBC will usually delete personal data falling within the categories set out below at the date/time set out below

Record Type	Retention Period
Information about a computer and about visits to and use of this website (including an IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths	2 years following account closure.

Information provided when registering with our website (including email address)	2 years following account closure
Information provided when completing a profile on our website (including a name, gender, date of birth, interests and hobbies, educational details)	2 years following account closure
Information provided for the purpose of subscribing to email notifications and/or newsletters (including a name and email address)	Indefinitely or until the client chooses to 'unsubscribe'
Information provided when using the services on the website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use)	Indefinitely
Information relating to any subscriptions made (including name, address, telephone number, email address and card details)	2 years following account closure
Information posted to our website for publication on the internet	2 years after post
Information contained in or relating to any communications sent through the website (including the communication content and meta data associated with the communication)	2 years following contact
Any other personal information chosen to be sent	2 years following contact

UKCBC will retain documents (including electronic documents) containing personal data:

- a. to the extent that UKCBC is required to do so by law;
- b. if UKCBC believes that the documents may be relevant to any ongoing or prospective legal proceedings;
- c. and in order to establish, exercise or defend UKCBC's legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

Each day UKCBC runs a database backup copy of all electronic data contained on the UKCBC servers. This backup includes all information relating to all current users, as well as any information that remains on the server due to any reason contained in this policy. The purpose of the database backup is to retrieve lost information within a one year retrieval period should users on the UKCBC system experience any problems. All data backups are stored in a separate location for a time period of 14 days prior to the backup initially being stored.

Electronic documents

1. Electronic Mail: Not all email needs to be retained, depending on the subject matter.
 - All e-mail—from internal or external sources—is to be deleted after 12 months.
 - Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.
 - UKCBC will archive e-mail for six months after the staff has deleted it, after which time the e-mail will be permanently deleted.
 - Staff will take care not to send confidential/proprietary UKCBC information to outside sources
 - Any e-mail staff deems vital to the performance of their job should be copied to the staff's H: drive folder, and printed and stored in the employee's workspace.
2. Electronic Documents: including Microsoft Office Suite and PDF files. Retention also depends on the subject matter.

- PDF documents – The length of time that a PDF file should be retained should be based upon the content of the file and the category under the various sections of this policy. The maximum period that a PDF file should be retained is 6 years. PDF files the employee deems vital to the performance of his or her job should be printed and stored in the employee's workspace.
- Text/formatted files - Staff will conduct annual reviews of all text/formatted files (e.g., Microsoft Word documents) and will delete all those they consider unnecessary or outdated. After five years, all text files will be deleted from the network and the staff's desktop/laptop. Text/formatted files the staff deems vital to the performance of their job should be printed and stored in the staff's workspace.

Please note that UKCBC does not automatically delete electronic files beyond the dates specified in this Policy. It is the responsibility of all staff to adhere to the guidelines specified in this policy. In certain cases a document will be maintained in both paper and electronic form. In such cases the official document will be the electronic document.

Insurance Records

Record Type	Retention Period
Certificates Issued to UKCBC	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.) Permanent Insurance Policies (including expired policies)	Permanent

Legal files and Papers

Record Type	Retention Period
Legal communications and Opinions (including all subject matter files)	7 years after close of matter
Litigation Files	1 year after expiration of appeals or time for filing appeals
Court Orders	Permanent
Requests for Departure from Records Retention Plan	10 years

Miscellaneous

Record Type	Retention Period
Consultant's Reports	2 years
Material of Historical Value (including pictures, publications)	Permanent
Policy and Procedures Manuals – Original	Current version with revision history
Policy and Procedures Manuals Copies	Retain current version only
Annual Reports	Permanent

Personnel records

Record Type	Retention Period
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	6 years after end of employment/engagement
Employment Contracts	Individual 7 years after end of employment/engagement
Employment Records Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision
Job Descriptions	3 years after replaced.

Tax Records

General Principle: Donors Forum must keep books of account or records as are sufficient to establish amount of gross income, deductions, credits, or other matters required to be shown in any such return.

These documents and records shall be kept for as long as the contents, may become material in the administration of federal, state, and local income, franchise, and property tax laws.

Record Type	Retention Period
Tax-Exemption Documents and Related Correspondence	Permanent
Tax Bills, Receipts, Statements	7 years
Tax Returns	Permanent
Sales/Use Tax Records	7 years
Annual Information	Returns Permanent
Tax Bills, Receipts, Statements	7 years
Tax Returns	Permanent
Sales/Use Tax Records	7 years
Annual Information Returns	Permanent