

Records Management Policy

Responsible Officer	Data Protection Officer
Department	Directorate
Approved by	Executive Committee
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1 Introduction

1.1 Records management is essential for the efficient conduct of business and adherence to legal obligations. The Institute is committed to establishing and maintaining good records management to ensure that it retains important information while also ensuring that data no longer required is disposed of in line with its obligations under Data Protection legislation. A robust records management process also ensures that the Institute can fulfill disclosure requirements to data subjects and also under the Freedom of Information Act (2000). The records management policy includes Record Retention Schedules and how long we keep personal data.

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1.2 This Policy supplements the Institute's Data Protection Policy and should be read in conjunction with it. It should also be read in conjunction with the Information Security Policy and guidance on email usage.

2 Records

2.1 Records can be defined as Information created, received and maintained as evidence and information by an organisation or person in pursuance of legal obligations or in the transaction of businesses.

2.2 Records are an essential resource and contain information which is unique and invaluable. They can be used as an audit trail as they provide evidence/proof of a specific activity. Records come in electronic (including emails, video and audio materials) and paper format. It is important that both types must be managed equally well, especially in terms of storage, accessibility and disposal.

2.3 Records should be managed accordance with the principles below:

Records - Records are evidence of our actions and decisions and must be retained as long as required

Responsibility - All staff have responsibility for Records and should be aware of what they are using and creating and how they should be retained;

Risk - There are significant risks from loss, damage or unauthorised access which need to be managed effectively. There are also risks from loss of control of records;

Retention - Keep records only as long as they are needed;

Rights - The public has a right to access our records subject to data protections regulations and Freedom of Information exemptions;

Reliability - Records should be managed effectively to ensure that they are high quality and reliable.

3 Retention Schedule

3.1 The purposes of Retention Schedule are to:

- Improve efficiency of working practices and enable easy and speedy retrieval of records;
- Prevent records from being discarded prematurely;
- Ensure that information is not kept unnecessarily;
- Eliminate retention of duplication of records;
- Provide a consistent, controlled system for the disposal of material across the Institute;
- Help in saving space, time, effort and money;
- Comply more readily with requests for information, both internally and externally (e.g. request made under Data Protection Legislation or the Freedom of Information Act 2000).

3.2 A properly implemented and consistently applied Records Retention Schedule improves the efficiency of working practices, and protects the interests of the Institute by ensuring that records are not kept for longer than they are needed to meet operational needs.

3.3 The Institute does not keep all records permanently. Only records which have, evidential, legal, historical, or business importance are retained for a specific length of time or permanently (in limited cases). The time periods for retention are outlined in the retention schedule.

3.4 Multiple copies of records should not be retained. Extraneous copies of paper documents are to be disposed of. Where these include personal data or confidential information these should be disposed of securely in confidential waste bin or shredded. Only one copy of the document is therefore retained for retention purposes. This also applies to emails. Key emails should be retained and care taken to establish which should be maintained and which deleted.

4 Staff Responsibilities

4.1 Heads of Schools and Central Service Departments have overall responsibility for the management of records generated by activities within their departments.

4.2 The Head of HR and the Academic Registrar have particular responsibility to ensure the integrity of the staff and student records respectively. The Director of Alumni and Development is responsible for managing alumni records and those of donors while the Head of Admissions is responsible for applicant data.

4.3 All staff that create, receive and use documents have record management responsibilities. Each member of staff is responsible for ensuring that records within their control are not kept permanently, unless they fall within the various categories listed in the Retention Schedule and need to be retained for archival purposes.

4.4 All staff should be aware that they are creating records through their work and ensure that these are secured and disposed of appropriately, including emails. They should establish which emails are key records and act accordingly.

5 Format of Retention Schedule

5.1 The Retention Schedule which forms part of this Policy has been prepared to assist in the effective management of records by identifying types of documents held by each Department which require retention, setting out the retention period for each type of document, who is responsible and the reasons for keeping it.

5.2 The Records Retention schedule can be found in Appendices below . The information is organised by class and type of record . In each class a list of records associated with the business function responsible for the class is provided, along with the retention period applicable to each record, and the justification relating to the retention period.

5.3 The retention periods are independent of format and therefore apply to any medium whether paper or electronic records.

5.4 There is an "Owner of Records" category which identifies the head of administration, department who has overall responsibility for the management and disposal of the record. The Owner of the Record is responsible for the implementation of the Retention Policy within

their area of responsibility must ensure that records are managed in accordance with the schedule and disposed of when required on an annual basis.

5.5 Where documents do not fall within the various categories set out in the Retention Schedule, advice should be sought from the Institute Secretary.

Appendix 1 - Student Services record retention schedule

Department	Purpose of processing	Types Personal data collected	Retention period
Student Services	On receipt of an email to the Student Services generic email account, provide guidance and support to potential, current & graduates	Student details and some special categories data	End of registration + 6 years
Student Services	To analyse Hardship forms for students	Student details, sensitive data, 3 month bank statements, copy of childbirth certs, tenancy agreements, pay slips, debtor notices, eviction letters, debt letters etc.	End of registration + 6 years
Student Services	To analyse Scholarship & Bursary forms for students	Student details, payslips, SFE letters	End of registration + 6 years
Student Welfare	To provide guidance and advice to students with Welfare issues	Student details Welfare records	End of registration + 6 years
Volunteering	To credit students with volunteering hours on their HEAR	Student details and history of volunteering	End of registration + 6 years
Careers	To provide guidance on career planning and employment applications	Students details, work and volunteering history, CVs, job applications	End of registration + 6 years
Wellbeing	To provide disability and mental health support services	Student details Disability & MH evidence	End of registration + 6 years
Counselling	To provide counselling support services	Student details	End of registration + 6 years
Placement and Employment Services	To provide support to students undertaking a work placement/internship	Student details	End of registration + 6 years
Placement and Employment Services	To promote employment opportunities through online jobs portal	Student details	End of registration + 6 years
Placement and Employment Services	Student employment within BITE Business Network	Student details, right to work information	End of registration + 6 years
Student Advice	To provide Student Advice on SFE, NHS, Tier 4, Benefits, Homelessness support services	Student details financial evidence or any relevant person documentation required	End of registration + 6 years
Student Advice	To provide Student Advice on immigration to support visa application	Student details, passport, photos, financial evidence or any relevant person documentation required	End of registration + 6 years

Appendix 2 - Registry record retention schedule

Department	Purpose of processing	Types Personal data collected	Retention period
Registry	To enrol students and manage their academic progression through to award.	Student personal and contact details (name, date of birth, addresses, academic record, next of kin etc.)	End of registration + 6 years
Registry	Maintain a record of award data	Student name, date of birth, student number, award details and academic transcript.	In perpetuity
Registry	To collect data for statutory submissions (e.g. HESA, SLC)	Student personal and contact details, academic record and (optionally) ethnicity, disability etc.	End of registration + 6 years
Registry	To process requests for mitigation, extension etc., or special requests via the Registry Casework Panel.	Student personal details (name), course details, and details of reasons for the mitigation request (e.g. illness, bereavement, which may contain Special Category Data)	End of registration + 6 years
Registry	To process academic offences information	Student personal details (name), course details, and also details of the offence	End of registration + 6 years
Registry	To process DBS cases	Student personal details (name), course details, criminal conviction data and also details of the DBS case	End of registration + 6 years; NMC may have requirements for longer safekeeping (this is being investigated).
Registry	Maintenance of the student record data and its systems	Student record data including name, contact details, student ID, academic progression data and any disclosed special category data	As defined for each record type
Registry	To process archival work/requests for confirmation of study	Student personal details (name), their course and module details, and results (certificates and transcripts)	Request: 1 year (record in perpetuity)
Registry	To process personal data of graduates for professional bodies	Student personal details (name), their course details, and results	End of registration + 6 years
Registry	To process minutes and paperwork of the Validating University	Names of committee members and their roles. Paperwork also contains details of students' previous studies and may also contain e.g. copies of original certificates and transcripts, and copies of marriage certificates, to prove name change.	End of registration + 6 years
Registry	To process personal data for the purpose of conferring an award (or prize)	Student personal details (name), course details, and results.	Graduation planning data: 1yr after ceremony. Award data: in perpetuity

Appendix 3 - Human Resources record retention schedule

Department	Purpose of processing	Types Personal data collected	Retention period
HR	Employment contract	Staff personal files and records e.g (personal details, contract of employment, sick certificates and medical records (i.e relating to adjustments/injury at work), paid leave and other terms and conditions, lifecycle information and termination of employment, including settlement agreements and agreed references)	6 years after employment ends (settlement agreements and agreed references will be retained indefinitely after employment ends)
HR / Payroll	Contractual pay	Current bank details	No longer than necessary - paper copies will be destroyed once details are uploaded onto Payroll
HR	Occupational Health Referrals	OH form	6 years after employment ends
HR	Recruitment	Application forms and interview notes (for unsuccessful candidates)	6 months advisable (longer for UKVI purposes if CoS candidate appointed)
HR	Contractual pay	Wages and Salary Records (including overtime, bonuses, expenses)	6 years after employment ends
HR	Contractual pay	Maternity/Paternity/ Adoption Pay Records (statutory, calculations, certificates (Mat B1s) or other evidence).	6 years after employment ends
HR	Contractual pay	Statutory Sick Pay Records, Calculations, Certificates, Self-Certificates, fit notes, information relating to adjustments and injury at work.	6 years after employment ends
HR	Employment contract	Unpaid - Parental Leave .	18 years from birth/adoption of the child.
HR	To comply with GDPR/ ERA 2010 and PSED	Equality monitoring data.	While processed and 6 years after.
HR	To comply with ROA regulation and CDB regulation.	DBS/CRB checks and disclosures of criminal records. Risk assessments	1) The check itself - no longer than 6 months; 2) Record of the check - 5 years (then re-checked); 3) Any risk assessment - 6 years after employment ends.
HR	To comply with Immigration and UKVI regulation in relation workers eligible to work in the UK.	Immigration Checks	2 years after employment ends .
HR	To comply with legislation (eg first aid training); to inform future developmental activities; continuing	Training Records	6 years after employment ends.

	professional development.		
HR	To maintain a record of management processes and their outcomes, and to defend claims.	Casework records, including disciplinary, grievance and performance management records (investigations, notes of meetings, correspondence, outcome letters, settlement agreements, legal advice).	6 years after employment ends.
HR	To keep a record of employee performance, objectives, and developmental needs	Appraisal records	6 years after employment ends.

Appendix 4 - IT Services record retention schedule

Department	Purpose of processing	Types Personal data collected	Retention period
IT Services	Tracking requests for IT help	Student and staff contact details - name, email, phone, IP address (sometimes). Some 3rd party contact information when we provide services to them	Last Action + 1 year
IT Services	Tracking requests for IT help (out of hours)	Student and staff contact details - name, email, phone, IP address (sometimes)	Per data sharing agreement, no longer than necessary, and nothing retained after end of agreement.
IT Services	Active Directory account/profile information	Student and staff names, email addresses, Institute phone numbers, role.	Closure of account + 1 year
IT Services	Active Directory account/profile information	Affiliate student names, email addresses	Closure of account +3 months
IT Services	Active Directory account/profile information (synchronised with MS Office 365)	Student and staff names, email addresses, Institute phone numbers, role.	30 days after account deletion
IT Services	Office365 account/profile information	Student and staff names, email addresses	30 days after account deletion
IT Services	Recording Information Security Incidents	Student and staff names	Last action on incident + 1 year
IT Services	Maintenance, management, and support of IT systems	Student and staff personal data and special category data	As per original retention
IT Services	Staff management	Staff appraisal data, copies of contracts, CVs, letters relating to employment, performance management correspondence, sickness absence correspondence, return to work forms, Occupational health assessments, DSE assessments	As per HR records retention schedule
IT Services	Tracking RFCs	Staff names	Decommissioning of system + 5 year
IT Services	Response to subject access requests	All types of data	Not retained after submission to Compliance team
IT Services	Contacting IT staff in an emergency	Names, phone numbers, email addresses	Removed at end of employment in IT
IT Services	Contacting IT staff	Names, phone numbers, email addresses	Annual refresh, including removal of unneeded data
IT Services	Recruitment management	Names, contact information, CVs, application forms?	Transferred to HR or destroyed at end of recruitment process
IT Services	Access to survey tool	Name and email	Removed when user account removed
IT Services	Controlling access to services	Name and email	Closure of account + 1 year
IT Services	Control access for Institute issued mobile device and usage	Name, email all call data	As per vendor contract

IT Services	Controlling access to services	Name and email	60 days after account closure
IT Services	Access to training and tracking of progress	Name and email	2 years after subscriptions end or 60 days after closing account
IT Services	Access to software all staff and students	Name and email	Stored for 7 years in encrypted backups
IT Services	Acess to software for SIS	Name and email	Stored for 7 years in encrypted backups
IT Services	Destruction of data on obsolete hardware	Anything	Data is not retained after processing,
IT Services	Maintenance and support of IT systems	Anything	Retained as per original system defaults
IT Services	development of IT Systems and testing	Anything	Not retained after testing is complete
IT Services	Managing access to systems	Names	Closure of Account + 1 year
IT Services	Printing payments	Student/Staff ID	At least 18 months from data of last transaction, as allowed and required by applicable law.

Appendix 5 - Property Services record retention schedule

Record category	Retention Period
CCTV Records	Legal requirement states that CCTV data should not be held for longer than is necessary. Recommended period is 31 days.
Health surveillance and medical records plus air monitoring and/or biological monitoring etc. kept by reason of the Control of Substances Hazardous to Health Regulations 2002	5 years or 40 years in respect of specific individuals.
Records relating to asbestos, medical records, training records, suspect incidents of potential exposure	40 years.
Ionizing Radiation Records	50 years after last entry

Appendix 6 - BITE Alumni Relations record retention schedule

Department	Purpose of processing	Types Personal data collected	Retention period
BAR	Providing an Alumni Community	Alumni Personal Data: Name, DOB, Contact details for home & business (addresses, phone, email, job title, company name), Course and Year of Graduation.	While Current or request to be forgotten
BAR	Providing an Alumni Community	Alumni Relations Board Profiles	While Current
BAR	Providing an Alumni Community	Alumni profiles, career journey and photos	While Current
BAR	Providing an Alumni Community	Raw data and analysis	While needed
BAR	Providing an Alumni Community	Event attendance	One year
BAR	Managing philanthropic aims	Gift records including gift agreements, letters from donors.	Date of gift + 6 years
BAR	Managing philanthropic aims	Communications to donors	Date of gift + 6 years
BAR	Managing philanthropic aims	Prospect research and due diligence on companies, individuals and trusts and foundations.	2 years or while current

Appendix 7 - Marketing record retention schedule (Recruitment, Admissions and Events)

Department	Purpose of processing	Types Personal data collected	Retention period
Marketing (Recruitment)	Communications with prospective students (pre-application)	Name, contact details, date of birth, subject of interest	3 years
Marketing (Recruitment)	Communications with applicants (application to enrolment)	Name, contact details, subject applied for	18 months after relevant application cycle
Marketing (Admissions)	Admissions	Applicant personal details as per application form.	Permanent for name and date of birth
Marketing (Events)	Communications with external stakeholders	Name, contact details, email address, place of work	Reviewed annually

Appendix 8 - International Office record retention schedule

Department	Purpose of processing	Types Personal data collected	Retention period
International	International Admissions Files: unsuccessful/withdrawn applicants	Application, English language, financial details, passport	End of Registration + 1 year
International	English Language Test Transcripts: enrolled applicants	Application, passport, test transcript	End of Registration + 1 year
International	English Language Test Transcripts': unsuccessful applicants	Application, passport, test transcript	End of Registration + 1 year
International	Scholarship Applications: unsuccessful applicants	Application	End of Registration + 1 year
International	Erasmus+ Outgoing Staff, Student and Traineeship Mobility Files and Agreements	Application, financial details	5 years from date of closure of applicable Grant Agreement
International	Prospectuses and Promotional Materials	n/a	Destroy once superseded
International	Agents and Due Diligence Contracts	Due Diligence Forms, References	Destroy once superseded
International	Recruitment Visits	Next of Kin and Emergency contact details	End of visit for file copy and electronic archive

Appendix 9 - Library Services record retention schedule

Department	Purpose of processing	Types Personal data collected	Retention period
Library Services	Documenting handling of requests from third parties to use material in which the institution owns the copyright	Name, address, email	Last action on request + 5 years
Library Services	Recording communication with suppliers (licences, contracts, negotiations, notes of meetings, copy invoices)	Name, address, email	Current + 6 years
Library Services	Documenting user requests for technical and application support, and assistance provided	Name, email or other contact details	Last action on request + length of contract
Library Services	User records stored within the SIS and Heritage detailing borrowing and other interactions with Library Services	History of items borrowed	Current + 3 years
Library Services	User records for external visitors (not members of the Institute) used to provide library services	Name, address, email	Current + 3 years
Library Services	User records of students requesting books in Alternative formats. Retention period is for the length of the student's course to ensure that we don't provide another copy of the same material	Name, student number, course details, course end date, email, library number personal tutor	Length of academic course
Library Services	Details of member of staff requesting a digitisation from the digitisation service.	Name, email, phone number, school, course details	12 months
Library Services	Register of attendance at library and IT inductions.	Student number, Name, course details and department	One academic Year
Library Services	Complaints, comments, and feedback spreadsheet	Name, School, Student ID	Current + 3 years
Library Services	Book suggestion form - requests to purchase information resource	Name, email, student ID	6 months

Appendix 10 - Academic Quality Office record retention schedule

Department	Purpose of processing	Types Personal data collected	Retention period
Academic Quality Office	To provide ongoing external examining to meet regulatory requirements	Application, financial details, passport, equalities data	End of contract for personal details and payment details. 10 years for External Examiner reports