

Cambridge Muslim College Data Retention Policy

1. Purpose

This document sets out the guidelines for retaining data associated with the College's activities.

2. Scope

This policy covers the storage of data handled by service contractors, employees, and students associated with the College.

3. Principles

- 3.1 Personal data refers to any information which identifies a specific individual, whether student, staff or an individual associated with the College in some other way.
- 3.2 The College fully endorses and adheres to the principles of data protection, as detailed in the Data Protection Act 2018.
- 3.3 The College regards the lawful and correct treatment of personal information as important to successful operations, and to maintaining the trust of those with whom it deals in various capacities.

4. References

- The Open University's Handbook for Validated Awards
- Data Protection Policy
- Confidentiality Policy
- Joint Information Systems Committee (JISC) guidelines on record management
- Data Protection Act 2018
- Information Commissioner's Office

5. Responsibilities

5.1. The Data Protection Officer is responsible for ensuring that day-to-day operations comply with the Data Retention Policy, working in collaboration with the IT Officer and Operations Director.

- 5.2. The Data Protection Officer is required to monitor, evaluate and review the effectiveness of this policy according to the College's policy review timetable, considering current good practice and having regard to any applicable law.
- 5.3. Document owners, as specified in the Retention Schedule below, are responsible for storing and shredding their hard copy documents and deleting electronically stored documents in line with the schedule.
- 5.4. Document owners are responsible for the destruction of documents whilst adhering to their responsibility under the Data Protection Policy, and Confidentiality Policy

6. Data Retention Schedule

Below is the schedule for the retention of College data indicating the type of data, responsible owner, retention period and reason for the retention period.

6.1. Governance

	Type of Data	Owner	Retention Period	Reason
1.	Documents relating to terms	Operations	Permanent	Legal
	of reference, articles of	Director		requirement
	association			
2.	Documents relating to			
	conducting Trustee meetings			
	and keeping minutes			

6.2. Faculty Board, Academic Advisory Road, Board of Examiners

	Type of Data	Owner	Retention Period	Reason
1.	Documents relating to terms	Programme	Superseded + 5 years	Operational
	of reference	Manager	then review for	information
2.	Documents relating to key		archiving value	
	operating procedures			
3.	Documents relating to			
	conducting and keeping			
	meeting minutes			
	Documents relating to			
	procedures for programme			
	validation			
4.	Documents relating to			
	procedures for			
	administrative tasks in			
	managing a programme			

6.3. Management

Type of Data	Owner	Retention Period	Reason
All strategic level documents	Operations	Superseded + 10	Operational
(e.g., strategic plans, risk	Director	years then review for	information
management plans, budget plans)		archiving value	
Documents relating to policies	Operations	Superseded + 10	Operational
(e.g., academic regulations, HR	Director	years then review for	information
policies)		archiving value	
Documents relating to	Operations	End of partnership +	Legal/
collaborative arrangements with	Director	6 years, then review	contractual
other institutions		for archiving value	

Type of Data	Owner	Retention Period	Reason
(e.g., contracts and formal			
agreements)			
Documents relating to	Operations	Termination of	Legal/
membership of professional	Director	membership + 1	contractual
associations and maintenance of		year, then destroy	
accreditation			
Documents relating to Letters of	Operations	Termination of	Legal/
Agreement/MOUs with Partners	Director	agreement/MOU + 1	contractual
		year, then destroy	

6.4. Health and Safety

Type of Data	Owner	Retention Period	Reason
Documents relating to legislative	Health and	Permanent	Legal
requirements for health and	Safety Officer		requirement
safety			

6.5. Equality and Diversity

Type of Data	Owner	Retention Period	Reason
Documents relating to legislative	Equality and	Permanent	Legal
requirements for equality and	Diversity		requirement
diversity (e.g., E&D policy,	Officer		
equality impact assessments)			

6.6. Human Resources

Type of Data	Owner	Retention Period	Reason
Documents relating to successful	Operations	Termination of	Operational
applications for vacancies	Director	Employment +6	information
		years	
Documents relating to personal	Operations	Termination of	Operational
staff files, including contracts,	Director	Employment +6	information
performance reviews, disciplinary		years	
issues, grievances, complaints			
Documents relating to	Operations	Completion of	Operational
unsuccessful applications for	Director	recruitment +6	information
vacancies		months	
Documents relating to reference	Operations	Last action + 1	Operational
requests	Director	year, then destroy	information
Documents relating to	Operations	Current Tax Year +	Income Tax
entitlements to, and calculations	Director	3 Years	(Employment
of, Statutory Maternity			Regulations) 1993

6.7. Finance

Type of Data	Owner	Retention Period	Reason
Documents relating to financial	Finance Officer	End of current	Legal
management		financial year + 6	requirement
(eg accounts, payroll handling,		years, then review for	
tax arrangements)		archiving value	
Documents relating to	Development	End of current	Legal
investments	Officer	financial year + 6	requirement
		years, then review for	
		archiving value	
Documents relating to insurance	Director of	End of current	Legal
	Operations	financial year + 6	requirement

100.016.02 | Data Retention Policy | 24 March 2022

	years, then review for	
	archiving value	
	archiving value	

6.8. Facilities

Type of Data	Owner	Retention Period	Reason
Documents relating to contracts	Facilities	Termination of	Legal/
with suppliers, rental agreements,	Manager	contract/	contractual
guarantees and warrantees.		agreement/	
		guarantee/	
		warrantee + 6 year,	
		then destroy	

6.9. Student Records

Type of Data	Owner	Retention Period	Reason
Awards and Classifications	Programme	Permanent	Core student
Documents relating to awards and	Officer		record
classifications			
Transcripts	Programme	Permanent	Core student
Student Transcripts and Diploma	Officer		record
Supplements			
Core Data	Programme	Permanent	Core student
Documents relating to core student	Officer		record
data (e.g., personal identifiers,			
assessment results, final award			
details)			
Admissions	Programme	Completion of	Core student
Documents relating to admissions	Officer	award+ 6 years, then	record
		destroy	
Scripts and Assignments	Programme	End of presentation	Operational
Student examination scripts and	Officer	+ up to 3 years	information
completed assignments			
Scripts and Assignments -	Programme	End of presentation	Operational
plagiarism	Officer	+ 5 years	information
Student examination scripts and			
completed assignments required			
for plagiarism purposes			
Assessment Feedback	Programme	Completion of	Operational
Documents relating to assessment	Officer	award+ 6 years, then	information
feedback		destroy	
Feedback Questionnaires	Programme	Current year + 5 years	Operational
Documents relating to	Officer	then review for	information
questionnaires and focus groups		archiving value	
used to monitor impact or measure			
the performance of activity			
Complaints – informal	Programme	Last action on	Operational
Documents relating to complaints	Officer	complaint	information
by students where the formal		+ 1 year	
complaints procedure is not			
initiated			
Complaints – formal	Programme	Last action on case +	Legal/
Documents relating to formal	Officer	6 years	Contractual
complaints by students	7		T 1/
Appeals	Programme	Last action on case +	Legal/
Documents relating to informal	Officer	6 years	Contractual
and formal appeals and formal			
complaints by students			

Type of Data	Owner	Retention Period	Reason
Academic Misconduct -	Programme	Closure of case/final	Legal/
disciplinary outcome	Officer	result issued + 25	Contractual
Documents relating to academic		years	
misconduct with a disciplinary			
outcome.			
Student Disciplinary – no	Programme	Last action + 1 year	Operational
charge	Officer		information
Documents relating to student			
disciplinary cases where the student			
was then cleared			
Student Disciplinary -	Programme	Closure of case/final	Legal/Contractu
disciplinary outcome	Officer	result issued + 25	al
Documents relating to student		years	
disciplinary cases with disciplinary			
outcome			
Student Disciplinary –	Programme	Student Birth	Core record
permanent expulsion	Officer	+120 years	
Documents relating to disciplinary			
cases where the outcome is			
permanent expulsion. (evidence of			
permanent expulsion if an expelled			
student attempts to reregister)			
References	Programme	Last action + 1 year,	Operational
Documents relating to reference	Officer	then destroy	information
requests			

6.10. <u>Data</u>

Type of Data	Owner	Retention Period	Reason
Documents relating to enquiries,	Data	Last action + 6 years,	Legal
complaints and requests from	Protection	then destroy	requirement
individuals/organisations external	Officer		
to the institution (e.g., Freedom of			
Information requests, Subject			
access requests)			
Documents relating to enquiries,	Data	Last action + 1 year,	Operational
complaints and requests made by	Protection	then destroy	information
individuals/organisations external	Officer		
to the institution (non-statutory)			
(e.g., complaint by resident)			

6.11. Marketing

Type of Data	Owner	Retention Period	Reason
Documents relating to	Media Officer	Last action + 2 years,	Operational
communications with those		then review for	information
external to the organisation and the		archival value	
internal handling of related			
responses (e.g., press releases,			
marketing campaigns)			

6.12. Event Planning

Type of Data	Owner	Retention Period	Reason	
Documents relating to the planning	Event owner	Completion of	Operational	
of specific activities, with a defined		activity +1 year, then	information	
end point.		archive. destroy		

Revision History

Revision Number	Effective Date	Description of Change
00	01 March 2017	New Policy
01	14 October 2021	 Updated to reflect 2018 Data Protection Act. Aligned with new document format. Record keeping for student data to be retained permanently. Owner for student data changed to Programme Officer.
02	March 2022	Amended clause 5.4 nd added 5.5 clarifying responsibility of document owner to store and destroy documents