

# Art Academy

## Data Retention and Disposal Schedule

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### 1. Introduction

Art Academy London holds a large amount of information that is vital to the running of the organisation. The objective of the Data Retention Policy is to provide guidance on the retention of the various types of data the Academy holds, balancing the need to store information with legal obligations to destroy the data safely when it is no longer required. It applies to information in all its forms - on paper, stored electronically or other media and throughout its lifecycle from creation through storage and utilisation to disposal.

The Academy is committed to protecting the security of data through the preservation of:

- Confidentiality: protecting information from unauthorised access and disclosure.
- Integrity: safeguarding the accuracy and completeness of information and processing methods.
- Availability: ensuring that information and associated services are available to authorised users when required.

The Academy has developed a guide on how long certain types of data are retained (section 4)

### 2. Considerations under the Data Protection Act 2018 (DPA 2018) and General Data Protection Regulations (GDPR).

The Academy will collect, retain and transmit personal data Data Protection Act 2018 (DPA 2018) and General Data Protection Regulations (GDPR). The Acts governs the collection, retention and transmission of information about living individuals and the rights those individuals have to see this information.

The principles are that personal data shall be:

- used fairly and lawfully
- used for limited, specifically stated purpose
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection (a country or territory must ensure an adequate level of protection).

### 3. Considerations under Payment Card Industry Data Security Standards (PCI DSS)

All staff at Art Academy London must store, process and transmit payment card information in accordance with PCI DSS mandatory requirements. This standard applies to information held on paper as well as electronically and to transactions processed both online and via a third party terminal. The Art Academy processes payment card information, for donations, materials, course fees and other areas. In order to comply with the Payment Card Industry Data Security Standards (PCI DSS) introduced in June 2007 the Academy agrees to:

- keep cardholder data storage to a minimum
- develop a data retention and disposal policy
- limit storage amount and retention time to that which is required for business, legal, and/or regulatory purposes
- never store the card verification code or value or PIN verification value data elements.
- only use an approved supplier of terminal card payment services
- not to store card payment information either on paper or electronically
- once a payment has been authorised completely erase following authorisation the 3 digit security code only retain the last four digits of the card number following authorisation. Paper forms with any remaining card details recorded to be kept securely in locked cupboards with access limited to authorised personnel. These paper forms must be destroyed as soon as they are not needed

## 4. Disposal of Information

Art Academy London has an obligation to dispose of personal, confidential and business critical information in a secure manner. The list is not exhaustive, but provides guidance as to best practice. This retention schedule should be read in conjunction with the Academy's Data Protection Policy. All Academy staff are responsible for following the schedule.

*Note that there are some circumstances where the schedule should not be applied, for example if there is a potential legal case or a freedom of information enquiry*

### Student Records

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
<b>Admissions, applications and induction</b>			
Records documenting the handling of enquiries from prospective students	Academic Team	Current Academic Year + 1 year	Good Practice
Records documenting the handling of applications for admission: unsuccessful applications	Academic Team	Current Academic Year + 1 year	Good Practice
Records documenting the administration of induction programme and events for new students	Academic Team	Current Academic Year + 1 year	Good Practice
<b>Student Registration</b>			
New students' personal details	Academic Team	Retain for administrative purposes and destroy when information is no longer current	Good Practice
Returning students' personal details (including name change information)	Academic Team	Retain for administrative purposes and destroy when information is no longer current	Good Practice
Student declaration of acceptance of terms and conditions of registration	Academic Team	Graduation/leaving + 6 years	Limitation period for negligence.

<b>Student fees</b>			
Student tuition fee record	Finance	Graduation/leaving + 6 years	Good Practice
Student Loans (information from SLC)	Finance	Graduation/leaving + 6 years	Good Practice
Bursaries/scholarships	Finance	Current financial year + 6 years	Good Practice
Debts (debt information)	Finance	Perpetuity	Critical business operation
Debts (debtors list and write-off list)	Finance	Perpetuity	Critical business operation
<b>General Student Files collated during the academic career</b>			
Facts of registration and academic performance (dates of study, progression, programme of study, marks, final award etc)	Academic Team	Perpetuity	Provision of references and confirmation of registration/final award etc.
Attendance monitoring reports	Academic Team	Current period + 6 years	Permits Academy to provide references for a reasonable length of time.
Full student records, including documents relating to application/admission; academic achievements and conduct; transfer, withdrawal or termination of studies.	Academic Team	Graduation/leaving + 6yrs	Permits Academy to provide references for a reasonable length of time. Also, limitation period for negligence.
Records documenting the handling of individual students' requests for statements of results/transcripts and third party requests for confirmation of student status etc.	Academic Team	Last action on request + 1 year	Good practice.
General correspondence with student	Academic Team	Graduation/leaving + 6 years	Limitation period for negligence.
<b>Programme &amp; Assessment Administration</b>			
Module content information, including module learning resources in Moodle	Academic Team	Current academic year + 6 years	Good practice.
Class/Tutorial lists & Schedules for submitting/marking work.	Academic Team	Current Academic Year	Good practice.
Records documenting individual students' submission of coursework	Academic Team	Current Academic Year + 1 year	Good practice.
Documents referring to coursework marks/grades and assessment.	Academic Team	Completion of studies + 1 year	Good practice.
Records documenting organisation of assessment (inc. special arrangements); attendance at vivas; handling of alternative	Academic Team	Current Academic Year + 1 year	Good practice.

assessment claims; collation and notification of results.			
Tracking Documents, Cohort Profiles, - Pass Lists/Award Lists	Academic Team	Perpetuity	Formal record, forms part of archive
Module and Elective Skills Workshop enrolments	Academic Team	Graduation/leaving + 6 years	Good practice.
Student Transcript and Diploma Supplement	Academic Team	Student birth + 120 yrs	Formal record, forms part of archive
<b>Student's Academic work</b>			
Coursework (including projects & reports, all years)	N/A	Nil - handed back to student after marking. Samples of coursework etc may be retained indefinitely as exemplars only with the consent of the author.	NB. In the event of an appeal, or a request from an examiner, it will be student's responsibility to provide the coursework for consideration.
Dissertations/ Research projects	To be retained in Library	Maximum of 2 copies retained indefinitely	Academic resource
<b>Student Support</b>			
Records detailing special arrangements for teaching and learning	Academic Team	Graduation/leaving + 6 years	Limitation period for negligence.
Support for failing students	Academic Team	Graduation/leaving + 6 years	Limitation period for negligence.
Disability issues incl. disclosure form and DSA	Academic Team	Graduation/leaving + 6 years	Limitation period for negligence.
Records of pastoral care	Academic Team	Graduation/leaving + 1 year	Good Practice
<b>Discipline, Appeals and Complaints</b>			
Records documenting the conduct and results of disciplinary proceedings against individual students.	Director of Academic Quality, Standards and Student Experience	Last action on case + 6 years.	Limitation period for negligence.
Documentation relating to academic offences	Director of Academic Quality, Standards and Student Experience	Last action on case + 6 years.	Limitation period for negligence.
Records documenting the handling and results of academic appeals by individual students.	Director of Academic Quality, Standards and Student Experience	Last action on case + 6 years.	Limitation period for negligence.

Records documenting the handling of formal complaints made by individual students.	Director of Academic Quality, Standards and Student Experience	Last action on case + 6 years.	Limitation period for negligence.
Records documenting the handling of complaints made by individual students where formal complaints procedure is not initiated.	Director of Academic Quality, Standards and Student Experience	Last action on case + 1 year.	Limitation period for negligence.
Suspensions	Director of Academic Quality, Standards and Student Experience	Settlement of case + 6 years	Limitation period for negligence
Disciplinary cases where the outcome is permanent expulsion	Director of Academic Quality, Standards and Student Experience	Student birth +120 years	Limitation period for negligence
<b>Graduation Ceremonies</b>			
Records documenting the organisation of award ceremonies	Academic Team	Completion of ceremony + 1 year	Good practice.
Records documenting the production, collection and mailing of award certificates.	Academic Team	Completion of ceremony + 1 year	Good practice.
<b>Miscellaneous</b>			
Surveys: Individual responses.	Academic Team	Completion of analysis of responses (unless used for historical statistical or research purposes).	Good practice.
Prizes awarded by the Academy	Academic Team	Perpetuity	Marketing
Student Council records	Academic Team	Current Academic Year + 3 years	Good practice.

## External Examiner Records

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
External Examiner reports and departmental responses	Director of Academic Quality, Standards and Student Experience	Perpetuity	Institutional Audit, Internal Programme Review and Accreditation purposes.

Records documenting the selection and appointment of external examiners.	Director of Academic Quality, Standards and Student Experience	Termination of appt. + 1 year	Good practice
Records documenting liaison with external examiners on administrative matters.	Director of Academic Quality, Standards and Student Experience	Current academic year + 1 year	Good practice

## Programme Documentation

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
Design and development of taught programmes and modules including module specifications and assessments	Director of Academic Quality, Standards and Student Experience	Review after life of the programme + 6 years.	Potential historic value
Delivery of taught programmes, including teaching and assessment materials	Academic Team	Review after life of the programme.	Good practice

## Employee Records

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
Application forms and references for unsuccessful candidates	Director of Operations	12 months	Feedback to applicants Time limits on litigation
Interview Notes	Director of Operations	12 months	Feedback to applicants Time limits on litigation
Facts of employment (dates of appointments, positions held etc)	Director of Operations	Perpetuity	Provision of references and requests for confirmation of employment.
All personnel files EXCLUDING information on disciplinary and/or grievance proceedings (but including health information, application forms and references)	Director of Operations	6 years from the end of employment	Provision of references and potential litigation.
Oral/ verbal warning (brief note on file) - Tutors	Director of Programmes	6 months	In accordance with Academy policy
Oral/ verbal warning (brief note on file) - Staff	Director of Operations	6 months	In accordance with Academy policy

Written warning (including notes disciplinary hearings kept on file (subject to satisfactory conduct and performance) - Tutors	Director of Programmes	2 years	In accordance with Academy policy
Written warning (including notes disciplinary hearings kept on file (subject to satisfactory conduct and performance) - Staff	Director of Operations	2 years	In accordance with Academy policy
Documentation relating to grievance hearings (notes, reports etc)	Director of Operations	2 years	Allows for appropriate appeal mechanism and monitoring future grievances
Facts relating to redundancies (Where less than 20 redundancies)	Director of Operations	6 years from the date of redundancy	Time limits on litigation
Facts relating to redundancies (Where 20 or more redundancies)	Director of Operations	12 years from the date of the redundancies	Limitation Act 1980
Income Tax and NI Returns, including correspondence with tax office	Finance	6 years after end of the financial year to which the records relate	Income Tax (Employment) Regulations 1993
Statutory Maternity Pay records and calculations	Finance	6 years after end of the financial year to which the records relate	Statutory Maternity Pay (General) Regulations 1986
Statutory Sick Pay records and calculations	Finance	6 years after end of the financial year to which the records relate	Statutory Sick Pay (General) Regulations 1982
Wages and salary records	Finance	6 years	Taxes Management Act 1970
Accident books, and records and reports of accidents	Operations	3 years after the date of the last entry	Social Security (Claims and Payments) Regulations 1979; RIDDOR 1985
Termination of employment records including exit interviews	Director of Operations	Destroy after termination of employment + 7 years.	Limitation Act 1980
Staff pension files	Finance	Review after termination of employment + 75 years.	Social Security Contributions & Benefits Act 1992; Limitation Act 1980
Disclosure and Barring Service (DBS) checks – application identification forms	Director of Operations	Completed check +1 month	DPA 2018 GDPR 2018

## Health & Safety Records

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
Pre-employment health screening questionnaire	Director of Operations	During employment plus 3 years	Management of Health and Safety at Work Regulations 1999
Occupational Health Records - health surveillance and medical records relating to risk assessments or incidents occurring at work	Director of Operations	40 years	Management of Health and Safety at Work Regulations 1999 Noise at Work Regulations 1989
Occupational Health Records where reason for termination of employment is connected with health, including stress related illness	Director of Operations	During employment plus 3 years	Limitation period for personal injury claims (there may be circumstances where it is not practical to separate these from other Occupational Health Records)
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	Director of Operations	5 years or 40 years in respect of specific individuals	Control of Substances Hazardous to Health Regulations 2002
Records relating to asbestos, medical records, training records, suspect incidents of potential exposure	Director of Operations	40 years	Control of Asbestos at Work Regulations 2002
General Risk assessments	Operations	Destroy after elimination of risk + 6 years OR updating of risk assessment + 6 years	Good Practice
Equipment Risk assessments	Operations	Destroy once superseded +10 years.	Management of Health & Safety at work regulations 1999
Fire safety risk assessments	Operations	Destroy once superseded + 5 years.	Required by the Regulatory Reform (Fire Safety) Order (2005), article 9
Fire safety arrangements including conduct and review of fire safety drills	Operations	Destroy after current year + 5 years OR superseded + 5 years.	Regulatory Reform (Fire safety) Order (2005), article 15
Health and safety training records	Operations	Destroy after current year + 5 years OR superseded + 5 years.	Good Practice
Firefighting training records	Operations	Destroy after current year + 5 years OR superseded + 5 years.	Regulatory Reform (Fire Safety) Order (2005), article 13



First aid training records	Operations	Destroy after current year + 3 years OR superseded + 3 years.	Required by Health and Safety (First Aid) Regulations (1981) Regulation 3
First aid competency certificates	Operations	Destroy once superseded + 3 years.	Good Practice
Health and safety monitoring and inspection records	Operations	Review after current year + 5 years OR superseded + 1 year.	Good Practice
Records of injuries, dangerous occurrences and outbreaks of notifiable diseases on the institution's premises	Operations	Review after date of recording + 3 years.	Regulations 2 and 7 of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (SI 1995/3163)
Accident/incident forms and subsequent investigation	Operations	Review after closure of investigation + 40 years.	Required by the Management of Health and Safety at Work Regulations (1999)
Response to accident/ incident	Operations	Review after last action on response + 10 years.	Good Practice
Letters from enforcing authorities about non-compliance issues	Operations	Review after current year + 40 years.	Good Practice

## General Administration

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
Publications, including annual reports	Academic Team Marketing	If external, destroy when no longer needed. If internal, review after publication date + 10 years.	Potential historic value. A set of copies of all principal publications should be retained and archived. This includes prospectuses, calendars, annual reports, research reports, accounts, examination papers and newsletters.
Records documenting the design, commissioning, editing and production of publications	Marketing	Review after publication date + 1 year.	Good Practice
References provided by Academy staff and tutors or current or previous staff or students	Various - Department specific	Destroy after provision of reference	DPA 2018 GDPR 2018
General bulk emails or mailings to internal and external audiences	Various - Department specific	Review once sent + 1 year	Good Practice

Records documenting work allocation/scheduling e.g. duty rosters, work planning and progress of this work	Various - Department specific	Review after completion + 1 year.	Good Practice
Office diaries (paper or electronic)	Various - Department specific	Destroy after current year + 1 year. This is a minimum period but be aware of data protection issues if keeping longer.	DPA 2018 GDPR 2018
Document templates	Various - Department specific	Review after superseded + 1 year.	Good Practice
Records documenting routine stocktaking, stock checking and movement of stock into and from storage	Operations	Destroy after current year + 1 year.	Good Practice
Recorded delivery post receipts	Admin team	Destroy after current year + 1 year minimum. If required to hold on file as evidence of delivery normally retain for a maximum of 6 years after graduation	Good Practice
Individual responses to monitoring and surveys	Academic Team	Destroy once analysis of responses complete.	Good Practice
Job specifications	Director of Operations	Review after termination of employment + 6 years.	Good Practice
Records documenting enquiries about vacancies, requests for application forms and unsolicited applications	Director of Operations	Destroy after completion of recruitment process OR receipt of application + 1 year. People's details may be kept on file longer than this to consider for future vacancies but only with their permission.	DPA 2018 GDPR 2018

## Boards Committees and Panels

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
All records, including: Minutes, agendas Development and establishment papers including constitutions, terms of reference, rules, procedures of the Board of Trustees and the Executive Team.	Director of Operations	Perpetuity: Archive for permanent retention as soon as possible after the record has been captured as the master version. Destroy duplicate	Critical business operation

		copies when they are no longer needed.	
All records, including: Minutes, agendas Development and establishment papers including constitutions, terms of reference, rules, procedures of the Academic Board	Director of Academic Quality, Standards and Student Experience	Perpetuity: Archive for permanent retention as soon as possible after the record has been captured as the master version. Destroy duplicate copies when they are no longer needed.	Critical business operation
Records documenting the development and establishment of committees (not listed above) including constitutions, terms of reference, rules, procedures, and any subsequent changes to these.	Director of Operations Or Director of Academic Quality, Standards and Student Experience  (as relevant; academic or institutional )	Review after end of life of committee + 6 years.	Critical business operation
Minutes, papers and agendas of academic committees, boards and panels including:  AQSEEC Examination and Progression Board Module Assessment Boards Extenuating Circumstances Panel Academic Misconduct Panel Research, Scholarship and Ethics Committee Academic Programme Managers Committee	Director of Academic Quality, Standards and Student Experience	Review after current year + 6 years.	Critical business operation  Limitation period for negligence
Minutes, papers and agendas of institutional operational committees, boards and panels including:  Facilities, Health & Safety committee	Director of Operations		
Minutes, papers and agendas of committees, boards or other groups set up specifically to manage a project	Various - Department specific	Review full set of records after the project completion date + 6 years.	Critical business operation
Sub committees and other working groups, informal staff meetings	Various - Department specific	Destroy once no longer required for reference.	Critical business operation
Working papers, action sheets, correspondence and personal notes	Various - Department specific	Destroy once no longer required for reference.	Critical business operation

Records documenting the appointment, election, designation of committee members	Various - Department specific	Destroy after termination of membership + 6 years.	Critical business operation
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## Financial Management

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
Capital/ Investment Plan	Finance	Review after current financial year + 6 years	Taxes Management Act 1970 c.9 s34;
Records documenting the value and disposal of capital assets	Finance	Review after current financial year + 6 years Review after current financial year + 6 years	Limitation Act 1980
Tax returns, preparation and filing records	Finance	Destroy after current tax year + 6 years (	Taxes Management Act 1970 c.9 s34
VAT accounting records	Finance	Destroy after current tax year + 6 years	Value Added Tax Act 1994 c. 23 s 58 and Schedule 11, para. 6(3); Value Added Tax Regulations 1995 s 31; HM Revenue and Customs 700/21 para. 5.2
Annual Accounts, Statutory Accounts, and Management Accounts, and the preparation of Annual and Statutory Accounts records including drafts and discussions	Finance	Destroy after current financial year + 6 years	Limitation Act 1980
Sales and Purchase Invoices	Finance	Destroy after current financial year + 6 years	Taxes Management Act 1970 c. 9 s 34; Limitation Act 1980; Value Added Tax Act 1994 c. 23; HM Revenue and Customs 700/21 para. 5.2
Goods received notes	Finance	Destroy after current financial year + 6 years	Limitation Act 1980; HM Revenue and Customs 700/21 para. 5.2
Utility and other bills	Finance	Destroy after current financial year + 6 years	Limitation Act 1980
Petty cash records	Finance	Destroy after current financial year + 6 years	Limitation Act 1980; Value Added Tax Act 1994 c.23; HM Revenue and Customs 700/21 para. 5.2

Bank account administration, including opening, closure, standing orders, direct debits, deposits, withdrawals, and account statements	Finance	Destroy after closure of account + 6 years OR life of instruction + 6 years	Limitation Act 1980; Taxes Management Act 1970 c.9 s34
Employee salary payment calculations	Finance	Destroy after current tax year + 7 years	The National Minimum Wage Regulations 1999, Regulation 38(7); The Income Tax (Pay As You Earn) Regulations Regulation 97(8); Taxes Management Act 1970 c.9 s34
Employer's PAYE records which are not required to be sent to the Inland Revenue under the provisions of the Income Tax (Pay As You Earn) Regulations 2003	Finance	Destroy after current tax year + 6 years	The Income Tax (Pay As You Earn); Regulations Regulation 97(8)
Statutory sick pay scheme administration records	Finance	Destroy after current tax year + 6 years	Statutory Sick Pay (General); Regulations 1982 Regulation 13
Statutory maternity pay scheme administration records	Finance	Destroy after current tax year + 6 years	Statutory Maternity Pay (General); Regulations 1986 Regulation 26
Employer and Employee contribution to pension scheme records for employees records	Finance	Review after termination of employment + 75 years.	Limitation Act 1980
Employee and Third party (e.g. Honorary appointees) expenses payment and reimbursement records	Finance	Destroy after current financial year + 6 years	Taxes Management Act 1970 c.9 s34; Limitation Act 1980
Tuition fees administration	Finance	Destroy after student leaves AAL/ graduates + 6 years.	Taxes Management Act 1970 c.9 s34; Limitation Act 1980

## Facilities Management

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
Property title deeds and lease agreements	Director of Operations	Review after life of lease/ disposal of property + 15 years	Limitation Act 1980
Property purchase and sale of investment records	Director of Operations	Review after current financial year (of transaction) + 6 years.	Taxes Management Act 1970 c.9 s34
Property files containing correspondence, administration of leases, tenancies, property inspections, valuations, disposal of properties by sale, transfer or donation, land registry information, planning, negotiation of leases and original lease	Director of Operations	Review after life of lease/ disposal of property + 15 years.	Limitation Act 1980;

agreements, other deeds or properties where the property was not acquired			
Project Works records	Director of Operations	Relating to major works: destroy after completion of works + 15 years.  Relating to minor works : destroy after completion of works + 6 years.	Limitation Act 1980 Good practice
Building records such as: -Planning and building regulations -Floor plans, master copies -Drawings, copies of floor plans -Enhancement records -Asbestos location plans and register -High voltage maintenance records -Legionella location plans, reports and risk assessments	Director of Operations	Destroy after disposal of property/ life of lease	Good practice
Building surveys	Director of Operations	Destroy after disposal of property + 6 years	Limitation Act 1980
Records documenting routine inspections of facilities	Director of Operations	Destroy after completion of two subsequent inspections	Best practice - retaining inspection records provides evidence of effective property management over time
Asbestos Records including remediation works records and reports, asbestos works framework, Asbestos Abatement work, Completion/ Air Monitoring Certification, writing plans of work, and notifications to enforcing authorities	Operations	Destroy after completion of work to which the monitoring relates +40 years OR removal of asbestos + 40 years OR subsequent inspection + 40 years OR disposal of building OR abatement + 40 years. Records should be offered to HSE or the individual concerned should the business cease trading.	Limitation Act 1980; Control of Asbestos Regulations 2012);
Meter readings	Operations	Destroy after current year + 5 years.	Good practice
Electrical certificates	Operations	Destroy once superseded + 5 years.	17th Ed IEE regulations
Lift inspection records	Operations	Destroy after inspection + 6 years.	Lifting Operations and Lifting Equipment Regulations (LOLER) 1998; Limitation Act 1980

Pest control records	Operations	Destroy after current year + 2 years.	Prevention of Damage by Pests Act 1949
Fire safety equipment maintenance checks and fire safety suppression systems records	Operations	Review after current year + 5 years.	Required by the Regulatory Reform (Fire Safety) Order (2005)
Inspection and maintenance records for equipment inside buildings including microwave ovens and PAT testing	Operations	Destroy after disposal of equipment + 6 years.	Electricity at Work Regulations 1998 and 17th Edition Wiring Regulations; Radiation regulations; Regulatory Reform (Fire Safety) Order (2005); Limitation Act 1980
Building alarm records	Operations	Destroy once equipment is removed.	Good Practice
CCTV records	Operations	Destroy after creation + 30 days.  NB Should an incident occur then review after last action on incident + 2 years.	Good Practice
Records documenting security breaches or incidents, and action taken	Operations	Retain live accessible record for 3 months. Review archived record after last action on incident + 6 years.	Good Practice
Crime reports	Operations	Review after current year + 1 year.	Good Practice
ICT system records: -Development -Post-implementation -Modification -Maintenance	Operations	Destroy after decommissioning of system + 5 years OR after last action on development + 5 years if implementation of system abandoned.	Good Practice
Visitor records	Operations	1 year	access for investigation of incidents.

## Legal and Compliance Records

Type of record	Responsibility	Minimum retention	Reason for Length of
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		period	Period
Records documenting legal advice requested by, and provided to, the institution concerning, for example: - interpretation of legislation affecting the institution's legal framework, governance, responsibilities or operations - proposals for new legislation affecting the institution's legal framework, governance, responsibilities or operations - the institution's relationships with government bodies and HE regulators - industrial relations issues - health, safety and environmental issues	Director of Operations	Perpetuity	Good practice
Records documenting legal advice on other matters requested by, and provided to, the institution	Director of Operations	Review once superseded + 6 years.	Good practice
Records concerning legal claims settled by agreement or withdrawn	Director of Operations	Review after settlement + 6 years OR withdrawal of claim + 6 years.	Limitation Act 1980
Litigation records involving the Academy where legal precedents are set	Director of Operations	Perpetuity	Limitation Act 1980
Litigation records involving the university where precedents not set	Director of Operations	Review after settlement of case + 6 years.	Limitation Act 1980
Records documenting the investigation, determination and resolution of an allegation made by a member of staff under the Public Interest Disclosure Act 1998	Director of Operations	Review after closure of case + 6 years.	Limitation Act 1980
Certificates of Liability	Director of Operations	Destroy after renewal of policy + 40 years.	Employers' Liability (Compulsory Insurance) Regulations 1998
Arrangement and renewal of insurance policy records	Director of Operations	Review after expiry of policy + 6 years.	Limitation Act 1980
Claims against insurance policies records	Director of Operations	Review after settlement of claim + 6 years.	Limitation Act 1980
Deeds contracts	Director of Operations	Review after termination of contract + 12 years.	Limitation Act 1980
Records relating to accreditation by external bodies	Director of Academic Quality, Standards & Student Experience	Review after end of accreditation + 6 years.	Good practice



Records documenting the handling of requests for information held by the institution, made under the Data Protection Act 1998, the Freedom of Information Act 2000 (c. 36) or the Environmental Information Regulations 2004	Director of Operations	Review after completion of request handling process + 3 years. A request handling process is completed when the request has been fulfilled or when all complaints and/or appeals (against non-disclosure of information or methods of handling the request) have been determined	Environmental Information Regulations 2004) DPA 2018 GDPR 2018 Freedom of Information Act 2000
Records documenting identified risks to the institution and assessments of those risks, i.e. risk registers, disaster response/recovery plans	Director of Operations	Review once superseded + 1 year.	Good practice

### Records relating to public courses.

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
New public students' personal details	Marketing Team/Public Programmes Team	Retain for duration of course + 3 years	Legitimate reasons for customer analysis. In line with GDPR 2018
Registers/ enrolments of public courses	Public Programmes Team	Retain for duration of course + 3 years	For purposes of advising on future courses/ progression dealing with complaints and processing credits

### Records relating to Fundraising, gifts and donations

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
Donors' personal details - refused donations	Director of Development	Retain for administrative purposes and destroy when a decision has been communicated.	Good Practice DPA 2018 GDPR 2018
Donors' personal details - accepted donations less than £500	Director of Development	6 years after the last donation or last positive interaction with AAL fundraising team, whichever is longer.	To keep an individual informed of their donation and other fundraising campaigns.

Donors' personal details - accepted donations greater than £500	Director of Development	Details concerning major donations (greater than £500) will be held indefinitely.	To keep an individual informed of their donation and other fundraising campaigns.
Gift Aid declarations	Finance	6 years after the end of the year or accounting period that includes the last donation	HMRC Tax Audit
Donors' Direct Debit Mandate	Finance	6 years after the end of the year or accounting period that includes the last Direct Debit	As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI
Risk assessment (and related paperwork) - refused donations	Director of Development	Retain for 6 years	To maintain a record of decisions
Risk assessment (and related paperwork) - accepted donations	Director of Development	Details concerning major donations (greater than £500) will be held indefinitely.	To maintain record of the donation and keep an individual informed of their donation and other fundraising campaigns.
Expression of interest; Legacy Donors - personal details	Director of Development	The records of Donors who have expressed an interest in leaving a gift in their Will to AAL will be retained until they expressly state that they will not be leaving such a gift or until four full financial years have elapsed from our notification of their death	To enable the identification of the correlation between expressions of interest and subsequent actions.
Legacy Donors - personal details	Director of Development	In perpetuity	To maintain record of the donation
Attendees of fundraising events - personal details	Director of Development	Retain for administrative purposes + 1 year unless the attendee has opted in (to further fundraising comms)	Good practice

## Marketing Records.

Type of record	Responsibility	Minimum retention period	Reason for Length of Period
New public students' personal details	Marketing Team/Public Programmes Team	Retain for duration of course + 3 years	Legitimate reasons for customer analysis. In line with GDPR 2018
Email addresses belonging to newsletter subscribers	Marketing Team	Retain indefinitely, until consent is retracted. Destruction review yearly	Consent is given to obtain data for marketing purposes. In line with GDPR 2018
Photography and videography with consent	Marketing Team	Retain until superseded.	Marketing Purposes
Course feedback	Marketing Team	Retain for 6 years	Marketing analysis
Contact details for suppliers, contractors, agencies, press	Marketing Team	Retain until superseded	Marketing Purposes
Contact details for stakeholders and business partners, including art schools and art shops	Marketing Team	Retain until superseded. Destruction review yearly	Marketing Purposes
Marketing campaign material	Marketing Team	Retain until superseded + 6 years	Marketing Purposes
Information on website	Marketing Team	Retain until superseded + 6 years	Marketing Purposes

## 5. Maintenance of Policy

This policy will be reviewed every three years at the instigation of the Board of Trustees. There will be an annual review to ascertain if amendments to the Retention Schedule or policy are required due to changing legislation or business requirements.

### Policies and documents that supplement and reference this document:

Data Protection Policy  
Information Security Procedures

Document name	Data Retention and Disposal Schedule	Document owner	Jane Laborie
Date originally created	June 2018		
Version	6	Review date	January 2024
Author of amendments	Darren Nairn	Next review date	January 2025

Changes (list sections)	Section 4 : Addition of 'cohort profiles' to student records. Addition of section relating to fundraising, gifts & donations		
Approved by	Board of Trustees	Date of approval	January 2024