



# Data Data Retention and Archiving Policy

## Document Control

Issue No: 6

Issue date: Aug 2020

Review date: Aug 2021

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## Document Scope

1. In order to comply with Data Protection legislation, Accrediting Body requirements and commercial working relationships, The Write Time will commit to retain and archive data in accordance with the following policy requirements.

2. For the purposes of this policy data will include paper, electronic media, and any other method used to store information:

3. The Write Time will commit to retaining all data records for maximum 7 years (for ESF-related contracts the retention period is 10 years after the final claim is paid by ESF), a shorter period for selected personal data provision may be appropriate to stay within the requirements of the Data Protection Act Principle 5 "...shall not be kept for longer than is necessary for that purpose or those purposes" and GDPR (please see GDPR Policy)

## Exceptions to the Prescribed Limit

Reasons for retention longer than 7 years: (i.e. exceptions to point 3 above)

- A threat of litigation / legal action, affected records will not be amended or disposed of until the threat is settled or removed
- Records maintained for the purposes of retrospective comparison.
- Records that relate to individuals or service providers judged to be unsatisfactory. (this includes records of employees or volunteers who have been subject to serious disciplinary action)
- Records archived for research purposes
- Statute requires a longer period

## All Student records

The Write Time will commit to retaining all student records for maximum 7 years.

### This covers:

Application forms and interview notes

Individual Learning Plans

Copies of notes and assessment records

Copies of assessment and verification records related to the student

Any other documentation deemed necessary for retention by the Head of Learning

## Email records

The Write Time will retain all email audit trails and log records for a maximum 7 years.

## ICT Records

All log files and system records which are deemed necessary for retention by IT Services (log files, access files, etc.) will also be kept for a maximum of 7 years.

## Data Storage

All data storage will be in compliance with The Write Time IT Services: that in the initial stages, (6-18 months) data will be retained on hard magnetic storage or equivalent, before being copied onto alternative media for archival storage purposes.



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### Printed Storage

All printed storage will be collated and retained for 7 years (subject to point 3) in nominated archival facilities provided by The Write Time.

### Archiving Procedures

- Archiving is project or Programme specific and has to have an owner attached.
- Finance Director will allocate a unique, Archive number, location, shelf and box number for the request.
- The labels will need to be printed and attached to the box(s) on three sides.
- When this is completed the Finance Director will co-ordinate the actual moving of the boxes to the archive store.
- An email will be sent when the process is complete.

### Destruction and Disposal

All data of a personal, confidential or sensitive nature will be securely destroyed when no longer required or when the 7 year limit has been reached.

- Electronic data & back-ups will be erased in a way that cannot be recovered.
- Media storage devices, CD's, Magnetic storage, portage storage devices will be physically destroyed to render items unusable and irretrievable
- Paper based records / data will be mechanically shredded as a minimum, if the content is in any way sensitive or confidential.

When Data is destroyed and disposed of a log will be kept of the individual or organisation completing the task.