

## INTERIM RETENTION SCHEDULE (Council 29 June 2010)

Approved by Council 29 June 2010 as a preliminary stage towards the establishment of a full Retention Schedule for the College.

Revised by Information Management and Systems Committee in the Spring and Summer terms 2011 (Minute 4 of 1 March 2011 and Minute 4 of 26 May 2011 refer)

This brief listing generally omits detail in areas where a statutory retention period applies. In these cases, the relevant records are the responsibility of a specialised central office at Goldsmiths. (Examples: Health and Safety (very extensive and complex requirements), Statutory Maternity and Sick Pay, tax and accounting.) When a full Retention Schedule is introduced by the College, these will be included. Retention of committee papers is currently the subject of a separate review of retention which will report during the academic year 2010-11, and will take into account the agreed retention policies for other material in specialist areas.

**"+1", "+2" etc means "plus one complete academic year", "plus two complete academic years" etc.**

**Shading of the number of an item in the left-hand column indicates a revision of the Schedule since first approved by Council in June 2010.**

1	Any personal data relating to <b>unsuccessful applications for student places</b> (all levels of study)	Current academic year + 1	Not normally held in academic departments except for postgraduates. Successful applications become part of the student record and therefore their retention period is specified elsewhere.
2	Any personal data relating to <b>unsuccessful applications for student funding</b>	Current academic year + 1	This applies only to personal data held directly by Goldsmiths. Where another organisation (normally funding body) is Data Controller, their retention policy will apply.

3	<p><b>Student data: "+6" retention</b> Administration of academic programmes post-admission, where this involves individual student data in one of the following categories:</p> <ul style="list-style-type: none"> <li>(a) financial information (eg fee collection, debts, student loan information);</li> <li>(b) evidence of enrolment and attendance (needed to support financial records by providing evidence of liability for fees);</li> <li>(b) academic progression or degree result (including academic appeals);</li> <li>(c) complaints (including non-academic);</li> <li>(d) disciplinary cases;</li> <li>(e) "reasonable adjustments" for Disabled Students.</li> <li>(f) equal opportunities monitoring information.</li> </ul> <p>(Examples of information in this category: Examination Board papers and minutes; upheld allegations of plagiarism; bursaries; fee collection.)</p>	<p>End of academic year in which student relationship with relevant programme (or last action in a case extending post-graduation) ends +6<sup>1</sup></p>	<p>This category of student personal data needs to be kept for six years only by the central administration; for academic departments this represents the maximum permitted period of retention (and in practice most departmental copies will be destroyed with data from the "+3" category (see Item 6)</p> <p>Student data transferred to alumni record (q.v.) will have a longer retention and is therefore specified separately in this table (see Item 4); consent for this is obtained on enrolment and confirmed in post-graduation interactions. However, consent is not a condition of enrolment; hence a mechanism for preventing automatic uploading to the alumni database is needed within student database.</p> <p>For PhDs where candidate registered for examination before 1 April 2010, the University of London is Data Controller for some of this personal data: its retention policy applies.</p> <p>From 2009-10 onwards, Student Loans Company or successor body rather than Goldsmiths is Data Controller for student bursary data (but not hardship funds): their retention policy applies.</p>
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<sup>1</sup> "End of student relationship" is normally by graduation, but may occur by a student leaving before graduation, or occasionally by death. The way in which the student relationship is terminated does not affect the retention period for personal data in this category.

<p><b>4 Alumni records of leavers (kept long-term or permanently)</b></p> <p>(a) the following personal data transferred routinely from student database on graduation (provided student has given written consent):</p> <ul style="list-style-type: none"> <li>• Name (together with any identification numbers or codes applicable to the student cohort);</li> <li>• all contact details for a student current at time of leaving the institution (for student only; not next of kin or emergency contact details unless these are the same as the student's home contact details);</li> <li>• academic programme(s) followed in each year of study (and brief details of any unusual progression, eg intermission or retaking examinations);</li> <li>• award of degree or other qualification (with classification where applicable, and date);</li> <li>• prizes won while at Goldsmiths (see also 13 below) and other awards for academic excellence</li> <li>• information provided by the student about employment subsequent to graduation;</li> <li>• any other personal data expected to be required to produce formal transcripts and similar documents expected to be capable of being produced throughout a student's working life;<sup>2</sup></li> <li>• name of any Goldsmiths hall of residence in which the student has lived (with dates)</li> </ul> <p>(b) any personal data obtained directly from students subsequent to graduation, under a fair processing notice relating specifically to alumni relations purposes.</p>	<p>Provisionally, until 10-15 years after the student is known to be dead, or 80-85 years after graduation if no date of death is reported.</p>	<p>Students now normally give outline permission for this on enrolment. They can withdraw consent to keeping of data for alumni relations purposes at any time, but may not be permitted to withdraw consent to the keeping of the personal data in category (a) in the College's long-term records of its awards and associated services.</p>
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5	<p><b>Miscellaneous exceptional student data (data types applicable to a minority of students):</b> Any records not covered above, including:</p> <ul style="list-style-type: none"> <li>• fitness to practise vetting procedures (taking account of any retention period specified by a relevant professional or statutory body or similar organisation);</li> <li>• brief details of serious disciplinary offences;</li> </ul> <p>any other non-routine personal data</p>	As required: the student (or cohort group in the case of fitness to practise) will be informed individually of the intended retention period.	It is anticipated that academic departments will only be responsible for information in this category where there are formal "fitness to practise" monitoring requirements related to their programmes.
6	<p><b>Student data: "+3" retention</b> Administration of academic programmes post-admission, where student personal data is involved, other than in the categories specified above (and item 16 below, concerning references).</p>	End of academic year in which student relationship with relevant programme (or last action in ongoing casework extending post-graduation) ends + 3 <sup>3</sup>	<p><b>This will normally be the longest extent of student personal data retention in academic departments.</b> (Exceptions occur in certain departments in relation to the fitness to practise procedures of particular professions (see above); local variants of student work retention periods (see below) may also be relevant.)</p> <p>Where there is progression directly from one postgraduate degree to another closely-related to it, the records of the whole duration of postgraduate study may be considered for the purposes of this Schedule as one programme, where this appears most convenient to those who have responsibility for the records.</p>

<sup>2</sup> Information required in respect of transcripts and similar formal statements derived from student records may change for future cohorts; therefore at present the principle only is specified.

<sup>3</sup> "End of student relationship" is normally by graduation, but may occur by a student leaving before graduation, or occasionally by death. The way in which the student relationship is terminated does not affect the retention period for personal data in this category.

7	<p><b>Student work (mainstream retention in respect of all students).</b>  <i>NB This does not include PhD dissertations/theses, which are retained in perpetuity in the College Library, including those registered for examination prior to the April 2010, which were examined directly by the University. There is a programme of progressive digitalisation of Goldsmiths PhDs by the British Library.</i></p>	<p>End of student relationship with relevant programme+1, <b>except:</b></p> <p>For student work held on <i>Grademark</i> and <i>Turnitin</i>: six years from the end of the academic year following the uploading of the work to the system</p>	<p>Departments operating local arrangements for student work retention which differ from the standard College retention period must inform students of their policy and its rationale. (Examples of permitted variants: practical artefacts such as works of art often have to be destroyed a few weeks after the announcement of the outcome of an examination given their extreme bulk; coversheets for assessed work of taught Master's degree students may be retained for longer to inform the writing of references in support of PhD applications.)</p> <p>The Departmental Administrator should keep a record of any variant policy until the variant retention period has expired, or end of the student relationship +1, whichever is the longer period.</p>
8	<p><b>Student work samples</b>  - kept eg for purposes of programme review and development, staff development or for the information of future students: such data is normally anonymised for distribution.</p>	<p>Up to maximum period for which the student concerned has given consent to retention for the purpose(s) in question. Three years is the suggested period.</p>	<p>Consent must be obtained from the student(s) concerned. Some academic departments may wish to seek this consent from all their students, depending on their review and development policies. The possibility of obtaining an outline consent as part of the student enrolment process is under discussion. The Library operates a service under which postgraduate student work (other than dissertations at PhD level to which another protocol applies) may be held for this processing purpose on behalf of departments.</p>

9	<b>Appointment of External Examiners</b>	<p>Name, term of office and home institution held permanently (by being recorded in the minutes of Academic Board).</p> <p>Other information concerning particular External Examiners: end of academic year in which last appointment terminated +3 (apart from ephemeral correspondence eg on logistical matters).</p>	<p>Payments to External Examiners have (longer) retention period which derives from the fact that they are financial records and are governed by accounting rules. The information required for this longer retention is held by the Finance Department.</p>
10	<b>Appointment of External Examiners whose appointment was terminated by the College before the expiry of normal term of office</b>	<p>Name and copy of any correspondence sent to the Examiner terminating the appointment or stating the reason for termination: Academic year of termination + 6</p> <p>All other information has same retention period as other External Examiners.</p>	
11	<b>Records of procedures established by Examination Boards not relating to particular individuals (other than Regulations)</b>	At least Current year +6	
12	<b>Administration of any distribution of funds to students (eg bursaries; hardship funds) (both generic and personal data).</b>	Current year +6	

13	<b>Administration of student awards for academic excellence: prizes, scholarships etc</b>	Lists of prizewinners: retained permanently (and inputted to Alumni Relations record - see 4 above)  Other material in this area (both generic and personal data): current year +3	
14	<b>Personal data disclosures Requests for Data Subject Access and for Third Party Disclosure of Personal Data without Data Subject Consent, together with any personal data released in response. (Currently held only by Director of Student Services, Director of Human Resources and Data Protection Officer.)</b>	Brief record of name and contact details of Data Subject, and nature of request: retained permanently  Disclosed information: academic year of disclosure (or last correspondence concerning case if later) +6	Information disclosed may be held for longer than this in other record-keeping systems (depending on mainstream retention periods for the categories of information concerned).  If there is associated casework in other procedures (eg a grievance or complaint), the six-year retention period runs from the conclusion of that case.)
15	<b>Counselling records (staff or student)</b>	End of academic year of last engagement +6	Held only in the Counselling Service
16	<b>References provided to other organisations</b>	Academic year + 1 except where a reference is retained as a source of information for future references.	
17	<b>Internal references and references obtained from other organisations.</b>	Academic year of cessation of study at Goldsmiths (students) or employment (staff) +1 except where an internal reference is retained as a source of information for future references.	

18	<b>Unsuccessful job applications.</b>	All applications destroyed between one and two years after last login to E-recruitment website, or for applications held elsewhere:  academic year of application + 1 to 2 years.	Successful job applications will become part of the staff record of the successful applicant.
19	<b>Records of redundancy and severance arrangements (held by Human Resources Department)</b>	Academic year of redundancy or severance +6	Includes both severance under voluntary severance schemes and other severance arrangements.
20	<b>Performance reviews</b>	Retained until superseded by records of three subsequent PDRs.	In practice this normally means 4 years' retention.
21	<b>Staff Disciplinary cases.</b>	Academic year of closure of case +6	[Shorter time for oral warnings may later be agreed - tbc in light of final Council approval of new Disciplinary Policy]
22	<b>Staff Grievance cases.</b>	Academic year of closure of case +6	
23	<b>Other staff personal data held by Human Resources Department (where no statutory requirement or specific College policy decision applies)</b>	Academic year of cessation of last employment +6	Names and job titles will be held permanently in corporate records of many kinds.
24	<b>Staff personal files held by departments other than Human Resources (where no specific College policy applies).</b>	All information to be discarded in the Summer vacation following the departure of the member of staff.	Any personal data for longer retention and not already held by HR Department should be transferred there.
25	<b>Pensions correspondence and records (held by Finance Department)</b>	Termination of employment + 75	In principle, lifetime of individual concerned. (Files could be destroyed earlier in cases where the individual is known to be dead.)
26	<b>Most financial records other than pensions</b>	Current year + 6 in Finance Department/Agresso; current year + 2 in other departments	Departments other than Finance may keep financial records for longer than 2 years where they have reason to do so, but in any event should not keep them for longer than a further 4.

27	<b>Records relating to accidents</b>	Academic year of accident + 40	
28	<b>Images from CCTV cameras</b>	10 days	It is to be noted that at present some cameras on campus belong to other Data Controllers (including the Local Authority, Lewisham): the retention policies of these authorities apply to data collected by these cameras.
29	<b>Unsuccessful applications for Council membership</b>	Academic year of application +4	Equal opportunities monitoring data retained for longer in anonymised and aggregated form.
30	<b>Personal data of members of Council and independent members of Council committees (kept by CGIM)</b>	Permanent (unless the individual concerned requests destruction, in which case only the name and term of office will be retained).	Contact and biographical details are updated if provided by former Council members, but are not routinely sought actively.  In general very limited personal data of Council members is kept.