S P Jain London School of Management	**Records Management Policy**
Document Type	Policy
Administering Entity	Chief Operating Officer, Record Owners (Appendix A), all staff
Latest Approval/ Amendment Date	October 2026
Last Approval/ Amendment Date	April 2023
Approval Authority	Board of Directors
Policy Owner	Chief Operating Officer
Next Review Date	Two years from approval, or earlier if legislation or regulatory requirements change
Applies To	All staff (permanent, fixed-term, part-time and adjunct faculty), contractors, consultants and third parties who create or hold records on behalf of the School

Records management at a glance

- Every record has a Record Owner and a retention period. Find both in the Retention Schedule at Appendix A.
- Keep one authoritative copy in an approved system (Tribal, Adrenalin, Precuro, SharePoint/Teams). Do not use personal drives, desktops, USB sticks or your mailbox as a filing system.
- Keep records for as long as the schedule says, and no longer. Retention periods apply whatever the format: paper, electronic, email, video or audio.
- Retention runs from a trigger event (for example, a student leaving or a contract ending), not from when the record was created, unless the schedule says otherwise.
- Never destroy a record that is subject to a legal hold, an ongoing complaint, appeal, audit, investigation or an open data subject or Freedom of Information request. Deleting information to avoid disclosure is a criminal offence.
- Dispose of records securely (confidential waste or secure deletion) and record significant disposals in the Disposal Log (Appendix B).
- Record Owners carry out an annual retention review each September, after the academic year closes.

- If a record is not covered by the schedule, or you are unsure, ask the Director of Compliance and Governance before disposing of it.

1. Introduction and purpose

1.1 Good records management is essential to the efficient running of SP Jain London School of Management (the School) and to meeting its legal and regulatory obligations. The School is committed to creating and keeping the records it needs to operate, to evidence its decisions and to protect the interests of students, staff and the School, while disposing of information that is no longer needed in line with data protection law.

1.2 As a provider registered with the Office for Students (OfS), a holder of degree awarding powers and a licensed student sponsor, the School must be able to produce accurate and complete records at short notice for regulators, auditors, students and the courts. Our records are also the permanent evidence of the awards we confer.

1.3 This policy sets out how records are created, stored, retained and disposed of, and who is responsible. The Retention Schedule at Appendix A forms part of this policy.

1.4 This policy supplements the Data Protection Policy and should be read with it, the Information Security and IT Acceptable Use Policy and the related documents listed above.

2. Scope

2.1 This policy applies to all records created, received or maintained by the School in the course of its business, in any format and wherever held, including:

- paper files and documents;
- records in School systems, including Tribal ebs, BrightHR, HubSpot, Biotime, the finance and payroll systems and Microsoft 365 (Outlook, SharePoint, Teams and OneDrive);
- email, Teams chats and channel messages, recordings and transcripts of meetings and classes;
- images, video and audio, including photography and recordings of teaching;
- records held for the School by third parties, including recruitment agents, payroll and IT providers and other data processors.

2.2 It applies to everyone who creates or uses School records, including permanent, fixed-term and adjunct staff, contractors, consultants and agents acting on the School's behalf.

2.3 Records created by staff on personal devices or personal accounts in the course of School business are School records and are covered by this policy. Staff should not use personal accounts for School business.

3. Legal and regulatory framework

3.1 Retention periods in Appendix A are set by reference to the following, together with sector guidance and the practice of other UK universities and business schools:

- UK General Data Protection Regulation and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, in particular the storage limitation, accuracy and accountability principles;

- Freedom of Information Act 2000 and the Section 46 Code of Practice on the management of records, to the extent the School is a public authority under the Act;
- Limitation Act 1980 (generally six years for contract and tort claims, twelve years for deeds, three years for personal injury, with extensions for latent damage and for minors);
- Companies Act 2006 (statutory registers, minutes and accounting records), and HMRC requirements for corporation tax, PAYE and VAT;
- Home Office UKVI Student Sponsor Guidance (Sponsorship Duties) and Sponsor Guidance Appendix D for worker sponsorship, and the Immigration, Asylum and Nationality Act 2006 for right to work checks;
- employment legislation, including the Employment Rights Act 1996 and 2025, Working Time Regulations 1998, National Minimum Wage Regulations 2015, Equality Act 2010 and pensions auto-enrolment duties;
- Health and Safety at Work etc. Act 1974, RIDDOR 2013 and COSHH Regulations 2002;
- the OfS regulatory framework and conditions of registration, including conditions on consumer protection, student protection, harassment and sexual misconduct (E6), management and governance, and reporting of data;
- Higher Education (Freedom of Speech) Act 2023 and the Counter-Terrorism and Security Act 2015 (Prevent duty);
- the requirements of the QAA and OfS in relation to degree awarding powers, and BS ISO 15489-1:2016 (Records management).

3.2 Where a record falls under more than one requirement, the longest applicable retention period applies. Where legislation changes, the change takes effect immediately and the schedule will be updated at the next review.

4. Definitions

Term	Meaning
Record	Information created, received and maintained as evidence and as an asset by the School in pursuit of legal obligations or in the transaction of business (ISO 15489-1:2016), in any format.
Transitory information	Information of short-term value that does not need to be kept as a record, for example duplicates, drafts superseded by a final version, meeting invitations, and routine messages. It should be deleted once no longer needed.
Record Owner	The role with overall responsibility for managing and disposing of a class of records (see Appendix A).
Retention period	The minimum and maximum period for which a record must be kept, counted from the trigger.
Trigger	The event that starts the retention period, for example student departure, end of employment, end of contract or end of financial year.
Student departure	The date the student completes, withdraws or is withdrawn, or the date any subsequent appeal, complaint (including to the OIA) or legal claim concludes, whichever is later.

Term	Meaning
CY / AY / FY	Current calendar year / current academic year / current financial year. For example, "FY + 6" means six years after the end of the financial year to which the record relates.
Permanent	Kept indefinitely as part of the School's permanent record, reviewed periodically to confirm continued need.
Legal hold	An instruction suspending disposal of specified records because of actual or anticipated litigation, investigation, audit or information request.
Disposal	Secure destruction, deletion or anonymisation of a record, or transfer to the permanent archive.

5. Principles

5.1 The School manages its records in accordance with the following principles:

- Records: records are evidence of our actions and decisions and must be complete, accurate and kept for as long as required.
- Responsibility: all staff are responsible for the records they create and use, and must know where they are kept and how long they are retained.
- Risk: loss, damage, unauthorised access or uncontrolled copies of records create legal, regulatory and reputational risk and must be managed.
- Retention: records are kept only for as long as they are needed, as set out in the Retention Schedule.
- Rights: individuals have rights of access to their personal data and, where the Freedom of Information Act applies, the public has a right of access to information, subject to exemptions.
- Reliability: records are captured in approved systems, version controlled and protected so they can be trusted and retrieved quickly.

6. Roles and responsibilities

Role	Responsibilities
Board of Directors	Approves this policy and receives assurance on its operation through the Audit and Risk Committee.
Chief Operating Officer (COO)	Policy owner and senior lead for records management. Ensures resources, systems and training are in place and approves exceptions to the Retention Schedule.
Chief Operating Officer (COO)	Maintains the policy and Retention Schedule, advises on unlisted records, issues and lifts legal holds, maintains the Disposal Log, coordinates the annual retention review and reports compliance to the Audit and Risk Committee.
Director of Compliance and Governance	Advises on storage limitation and data protection compliance, data subject requests and breaches, and is consulted on changes to retention periods for personal data.

Role	Responsibilities
Record Owners (Appendix A)	Ensure records in their area are kept in approved locations, retained for the scheduled period, reviewed annually and disposed of securely, with significant disposals logged.
Registrar	Integrity of the student record, including the permanent record of awards, and records required for UKVI student sponsorship.
HR Manager	Integrity of staff records, including right to work, payroll inputs and personnel files.
Head of IT and Operations	Configures systems, Microsoft 365 retention settings and back-ups to support the schedule, manages secure deletion and IT equipment disposal, and maintains access controls.
Programme Directors and Heads of Department	Overall responsibility for records generated by activities within their departments, including assessment records.
All staff	Create adequate records of their work, save them to approved locations, identify which emails and messages are records, follow the schedule and never destroy records subject to a legal hold or open request.

7. Creating and storing records

7.1 Staff must create records that adequately document the School's business, including decisions and the reasons for them.

7.2 Records must be saved to the approved system for that type of record (for example, student records in Tribal ebs, staff records in Adrenalin, departmental records in the relevant SharePoint or Teams site). Personal OneDrive folders, desktops, removable media and mailboxes must not be used as the place of record.

7.3 Only one authoritative copy of a record should be retained. Duplicates and convenience copies should be deleted, or securely destroyed if they contain personal or confidential information.

7.4 Documents should use clear file names and version control so that the final approved version can be identified. Drafts may be deleted once the final version is approved, unless the schedule requires drafts to be kept.

7.5 Paper records containing personal or confidential information must be stored in locked cabinets or rooms. Where practical, paper records should be scanned to an approved system and the paper copy destroyed, unless an original is legally required (for example, deeds or signed agreements where an original is needed for evidence).

7.6 Access to records must be limited to those who need it. Special category data (for example, health or disability information) must be held with additional access restrictions.

7.7 Vital records, without which the School could not operate or meet its obligations (for example, the core student record and award data, staff and payroll records, financial records and governance minutes), must be backed up and covered by the School's business continuity arrangements.

8. Email, Teams and recordings

8.1 Email and messaging systems are communication tools, not record-keeping systems. Where an email or message is a record (for example, it documents a decision, an agreement, advice given or a complaint), it must be saved to the relevant system or file, and the retention period for that record class applies.

8.2 Transitory emails and messages should be deleted once no longer needed. Staff should review their mailboxes regularly.

8.3 Recordings of meetings and classes and their transcripts are records. Teaching recordings are kept in line with Appendix A (class A4). Recordings of internal meetings should be deleted once the minutes or notes are approved, unless the recording is needed as evidence (for example, a disciplinary or appeal hearing).

8.4 When a member of staff leaves, their line manager is responsible for ensuring records in their mailbox and OneDrive are transferred to the appropriate location before the account is closed. Mailboxes of leavers are retained for 3 months and then deleted (class A8).

9. The Retention Schedule

9.1 The Retention Schedule at Appendix A identifies the types of records held by the School, the retention period and trigger for each, the Record Owner, the justification for the period and the action to be taken at the end of it. Records are grouped into classes by business function.

9.2 Retention periods apply regardless of format and to all copies. Where a period is expressed as a number of years after a trigger, records should be disposed of at the first annual review after the period ends.

9.3 Retention periods are maximum as well as minimum periods for personal data. Keeping personal data beyond the scheduled period requires a documented reason approved by the Director of Compliance and Governance.

9.4 Where a record is not covered by the schedule, the Record Owner should seek advice from the Director of Compliance and Governance before disposal. Proposed changes to the schedule are approved by the COO and reported to the Audit and Risk Committee; substantive changes to this policy are approved by the Board.

10. Legal holds and suspension of disposal

10.1 Scheduled disposal must be suspended for any record that is or may be relevant to:

- actual or reasonably anticipated litigation or employment tribunal proceedings;
- a complaint, appeal or disciplinary process, including a complaint to the Office of the Independent Adjudicator (OIA);
- an investigation, audit or compliance visit by the OfS, UKVI, ICO, HMRC, the QAA, external auditors or the police;
- an open subject access request, Freedom of Information request or other information request.

10.2 The Director of Compliance and Governance (or the COO in their absence) issues and lifts legal holds in writing. Record Owners must confirm that relevant records, including emails and back-ups where necessary, have been preserved.

10.3 It is a criminal offence to alter, deface, block, erase, destroy or conceal information with the intention of preventing disclosure in response to a subject access request (section 173, Data Protection Act 2018) or a Freedom of Information request (section 77, Freedom of Information Act 2000).

11. Disposal

11.1 Each September, after the academic year closes, Record Owners will review the records in their area and dispose of those that have reached the end of their retention period. The Director of Compliance and Governance will issue a reminder and collate confirmations, and report completion to the Audit and Risk Committee.

11.2 Disposal must be secure and appropriate to the sensitivity of the record:

- paper records containing personal or confidential information must be placed in locked confidential waste bins or cross-cut shredded;
- electronic records must be deleted from the system, including any recycle bin, with deletion from back-ups occurring as back-ups expire in line with the back-up schedule;
- IT equipment and storage media must be wiped or destroyed by an approved provider and a certificate of destruction obtained;
- where a system cannot delete individual records, data should be anonymised or put beyond use, and the limitation recorded.

11.3 The disposal of records classed as "Review" or above, and any bulk disposal, must be recorded in the Disposal Log (Appendix B). The log itself is retained permanently. The log records what was destroyed, not the content of the records.

11.4 Where personal data may be retained in anonymised form for statistical or research purposes, anonymisation must be effective so that individuals can no longer be identified.

12. Permanent records and continuity of awards

12.1 Records of continuing value, including governance minutes, the core student record and the record of awards conferred, are kept permanently. As a degree awarding body, the School must be able to verify awards, issue transcripts and replacement certificates and respond to verification requests for the lifetime of its graduates.

12.2 Permanent records must be held in a format and system that will remain accessible. Before any system is replaced or decommissioned (for example, a student records or HR system), the Record Owner and Head of IT and Operations must ensure that records are migrated or exported in a usable format.

12.3 In line with the School's Student Protection Plan, arrangements will be maintained so that students and graduates can continue to access evidence of their academic achievement if the School were unable to continue to operate.

13. Records held by third parties

13.1 Contracts with third parties who create or hold School records, including recruitment agents, processors and software suppliers, must require them to retain and return or destroy records in line with this policy and data protection law, and to provide confirmation of destruction on request.

13.2 Record Owners for those contracts are responsible for ensuring that records are returned or destroyed at the end of the relationship.

14. Access to records

14.1 Requests from individuals for their personal data must be passed immediately to the data protection lead and handled under the Data Protection Policy. Requests for information under the Freedom of Information Act must be passed to the Director of Compliance and Governance.

14.2 Good records management enables the School to locate information quickly and to respond within statutory time limits. It also means the School does not hold information it no longer needs, which would otherwise have to be searched and potentially disclosed.

15. Training, monitoring and breaches

15.1 Records management and data protection form part of the mandatory training for all staff at induction and on a refresher basis. Record Owners will receive guidance on applying the schedule.

15.2 Compliance with this policy is monitored through the annual retention review, spot checks of approved systems and internal audit. A summary is reported annually to the Audit and Risk Committee.

15.3 Loss or unauthorised disclosure of records must be reported immediately under the Data Breach Procedure. Deliberate or reckless breach of this policy may result in disciplinary action.

16. Review

16.1 This policy and the Retention Schedule will be reviewed every two years by the Director of Compliance and Governance, or earlier if required by changes to legislation, regulation or the School's activities or systems.

Appendix A: Records Retention Schedule

How to use this schedule

- Find the record class and record type. The period is counted from the trigger shown in brackets. Where a record appears to fit more than one entry, apply the longer period.
- Action at end: Destroy - securely dispose of at the next annual review. Review - the Record Owner assesses continued need and either destroys or retains for a further defined period, logging the decision. Permanent - retain indefinitely as part of the School's permanent record.
- Legal holds (section 10) override the schedule. Where a student or staff member has an open complaint, appeal or claim, the trigger is the date that matter concludes.
- Record Owner abbreviations: COO - Chief Operating Officer; DCG - Director of Compliance and Governance; REG - Registrar; HR - HR Manager; CFO - Chief Financial Officer; IT - Head of IT and Operations; SE - Director of Student Experience; CAR - Head of Careers; PD - Programme Directors; DEAN - Dean; MKT – Director of Business Development; ADM - Admissions and Recruitment leads.

A1. Governance and corporate

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A1.1	Certificate of incorporation, articles of association, statutory registers (members, directors, PSCs), Companies House filings	Permanent	DCG	Companies Act 2006; legal identity of the School	Permanent
A1.2	Board of Directors minutes, papers and written resolutions	Permanent (minutes and resolutions); papers CY + 10	DCG	Companies Act 2006 ss.248 and 355 require at least 10 years; evidence of governance for OfS management and governance conditions	Permanent
A1.3	Minutes and papers of Board committees and academic committees (e.g. Audit and Risk Committee, Academic Board, ERC, CMC, Remuneration Committee)	Minutes permanent; papers CY + 10	DCG / committee secretary	Evidence of academic governance and oversight for OfS and degree awarding powers scrutiny; sector practice (Bristol, LSE retain minutes permanently)	Permanent
A1.4	Approved policies, procedures, regulations and codes of practice (each version)	Superseded + 6 years; master set of Board-approved versions permanent	DCG / policy owner	Shows which rules applied to students and staff at a given time; Limitation Act 1980	Review
A1.5	Policy drafts and consultation working papers	Final version approved + 1 year	Policy owner	Business need only once final version approved	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A1.6	Strategic plans, annual reports, Access and Participation Plans, Student Protection Plan (each version)	Permanent	COO	Institutional history; regulatory evidence	Permanent
A1.7	Risk Management Plan / risk register	Superseded + 6 years	COO	Evidence of risk management for Audit and Risk Committee and auditors	Destroy
A1.8	Internal and external audit reports and management responses	CY + 10	CFO / DCG	Audit trail; OfS financial and governance scrutiny	Review
A1.9	Legal advice and litigation files	Matter closed + 6 years (+ 12 years where relating to deeds or property)	COO	Limitation Act 1980 ss.5 and 8	Review
A1.10	Insurance policies and claims	Policy expiry + 6 years; claims closed + 6 years	CFO	Limitation Act 1980	Destroy
A1.11	Employers' liability insurance policies and certificates	Permanent (minimum 40 years)	CFO	Long-tail industrial disease claims may arise decades later; sector practice	Permanent
A1.12	Group and intra-group agreements (SP Jain Global entities)	Agreement end + 6 years (+ 12 years if executed as a deed)	COO	Limitation Act 1980	Review

A2. Regulatory compliance

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A2.1	OfS registration application, registration decisions, conditions of registration and specific conditions	Permanent	DCG	Evidence of regulatory status	Permanent
A2.2	OfS correspondence, reportable events, enhanced monitoring and investigation records	CY + 6 years	DCG	OfS regulatory framework; may be relevant to later investigations	Review
A2.3	Statutory data returns (Data Futures/HESA student return, OfS annual financial return, Graduate Outcomes) and the working files used to produce them	CY + 6 years	REG / CFO	OfS data audit and condition on reporting of data; ability to reconstruct returns	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A2.4	Degree awarding powers applications, assessment reports, QAA/OfS scrutiny records and evidence base	Permanent	DEAN / DCG	Basis of authority to award degrees; future applications (e.g. full DAPs)	Permanent
A2.5	UKVI sponsor licence application, licence, key personnel records and SMS user records	Duration of licence + 6 years	REG	UKVI guidance requires licence application documents for as long as the licence is held; extended for audit trail	Destroy
A2.6	UKVI compliance visits, Basic Compliance Assessment data and action plans	CY + 6 years	REG	Evidence of sponsor compliance history	Review
A2.7	Prevent duty risk assessment, action plan, annual accountability returns, training records	Superseded + 6 years	DCG	Counter-Terrorism and Security Act 2015; OfS Prevent monitoring	Destroy
A2.8	External speaker and event requests and decisions	Event + 3 years	SE	OfS Prevent monitoring and free speech duties; evidence of decisions	Destroy
A2.9	Prevent concerns and Channel referral records	Student departure or termination + 6 years	DCG	Safeguarding and evidence of proportionate handling; held with restricted access	Review
A2.10	Freedom of speech code of practice (each version), free speech complaints and OfS free speech complaints scheme records	Code: superseded + 6 years; complaints: closed + 6 years	DCG	Higher Education (Freedom of Speech) Act 2023; Limitation Act 1980	Destroy
A2.11	Harassment and sexual misconduct single comprehensive source of information (each version) and annual reporting	Superseded + 6 years	SE	OfS condition E6 requires a documented record of changes	Destroy
A2.12	Record of processing activities, data protection impact assessments, legitimate interest assessments	Superseded or processing ended + 6 years	DCG	UK GDPR Article 30 and accountability principle	Destroy
A2.13	Data sharing and data processing agreements	Agreement end + 6 years	DCG	UK GDPR Article 28; Limitation Act 1980	Destroy
A2.14	Subject access and other data subject rights requests, and data protection complaints	Request closed + 6 years	DCG	Evidence of compliance if challenged by the ICO or in court; Data (Use and Access) Act 2025 complaints duty; sector practice (Bristol CY + 6)	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A2.15	Personal data breach log and incident files, including ICO reports	Incident closed + 6 years	DCG	UK GDPR Article 33(5) requires breaches to be documented; ICO enforcement	Destroy
A2.16	Freedom of Information requests, responses and internal reviews	Request closed + 3 years	DCG	Covers ICO complaint and Tribunal appeal; FOIA Section 46 Code	Destroy
A2.17	Legal hold notices and the Disposal Log	Permanent	DCG	Evidence that records were disposed of in line with policy	Permanent

A3. Student lifecycle

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A3.1	Enquiries and prospective student records (HubSpot), including event attendance	Last meaningful contact + 2 years, or sooner if the person asks to be removed	ADM	UK GDPR storage limitation; typical recruitment cycle; sector practice	Destroy
A3.2	Applications that are unsuccessful, withdrawn or not taken up (including offers declined)	End of admissions cycle + 1 year	ADM	Allows for complaints, reapplication and admissions analysis; Jisc guidance and sector practice (Bristol, Reading)	Destroy
A3.3	Successful applications: application form, qualifications, English language evidence, references, interview records, offer and acceptance	Transfer to student file; student departure + 6 years	ADM / REG	UKVI requires evidence used to make the offer to be kept; Limitation Act 1980	Destroy
A3.4	Core student record: name, date of birth, student number, programme, modules, marks, progression decisions, award, classification, dates of study, transcript and award certificate data	Permanent	REG	Degree awarding body must verify awards and issue transcripts and replacement certificates for graduates' lifetimes; OfS student protection; sector practice (all peers reviewed retain permanently)	Permanent
A3.5	Student file: registration and enrolment, changes of programme or mode, interruption and withdrawal, correspondence, status letters issued	Student departure + 6 years	REG	Limitation Act 1980 (contract with student); sector practice (Bristol, LSE, Reading 6-7 years)	Destroy
A3.6	Identity verification and copies of passports or ID for non-sponsored students	Verification + 1 year, then retain only a note that verification was completed	REG	Data minimisation; fraud prevention	Destroy
A3.7	Student contracts / terms and conditions accepted	Student departure + 6 years	REG	Limitation Act 1980; consumer law (CMA guidance for HE providers)	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A3.8	Attendance and engagement data (Biotime, registers, VLE) for non-sponsored students	End of academic year + 2 years	REG	Supports progression decisions and appeals; summary retained in student file	Destroy
A3.9	Attendance monitoring interventions, students-at-risk and welfare notes	Student departure + 6 years	SE	Evidence of support provided; complaints and claims	Destroy
A3.10	Reasonable adjustments, learning support plans and disability evidence	Student departure + 6 years	SE	Equality Act 2010 claims; special category data held with restricted access	Destroy
A3.11	Mitigating circumstances and extension requests, decisions and supporting evidence	Decision and supporting evidence: student departure + 6 years. Medical evidence: decision + 1 year unless an appeal is lodged	REG	Supports appeals; minimises retention of health data; sector practice	Destroy
A3.12	Academic appeals, student complaints (including OIA complaints and Completion of Procedures letters)	Case closed + 6 years	REG / SE	OIA scheme (complaint within 12 months of Completion of Procedures letter); Limitation Act 1980	Destroy
A3.13	Academic misconduct and student disciplinary cases	Case closed or student departure + 6 years. Outcome affecting award recorded permanently in core record	REG	Appeals, OIA complaints and claims; verification of awards	Destroy
A3.14	Harassment, sexual misconduct and safeguarding reports and investigations	Case closed or student departure (whichever later) + 6 years	SE	OfS condition E6; Limitation Act 1980; possible later claims. Restricted access	Review
A3.15	Fitness to study and wellbeing case records	Student departure + 6 years	SE	Evidence of support and decisions; restricted access	Destroy
A3.16	Student fee invoices, payments, refunds, payment plans, sponsor letters and debt recovery	End of financial year + 6 years (debt: cleared or written off + 6 years)	CFO	HMRC and Companies Act 2006; Limitation Act 1980	Destroy
A3.17	Fee status assessments and evidence	Student departure + 6 years	REG	Evidence of fee classification decisions if challenged	Destroy
A3.18	Scholarships, bursaries and fee discounts: criteria, applications and awards	Successful: student departure + 6 years. Unsuccessful: end of cycle + 1 year	CFO / ADM	Audit trail; OfS Access and Participation monitoring where relevant	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A3.19	Student surveys and module evaluations	Raw responses: AY + 2 years. Reports and action plans: AY + 6 years	SE	Quality enhancement; data minimisation for raw responses	Destroy
A3.20	Graduation ceremony records, photography and filming	Ceremony + 2 years (images used in marketing: see A9.3)	SE / MKT	Business need; consent	Destroy
A3.21	Alumni records for engagement	Until the alumnus asks to be removed; reviewed every 5 years	CAR / MKT	Legitimate interests; privacy notice; a suppression record is kept to honour opt-outs	Review

A4. Teaching, assessment and academic quality

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A4.1	Examination scripts and assessed coursework not returned to students	Ratification of marks + 1 year, or conclusion of any appeal or complaint (including OIA), whichever is later	PD / REG	Allows for appeals and OIA complaints; sector practice (LSE 1 year, Reading 2 years)	Destroy
A4.2	Representative samples of assessed work retained for quality assurance and external examiners	AY + 6 years	PD	Evidence of standards for degree awarding powers and periodic review	Destroy
A4.3	Mark sheets, moderation and second marking records	AY + 6 years (final marks held permanently in core record A3.4)	PD / REG	Evidence of academic standards; appeals	Destroy
A4.4	Assessment board / progression and award board minutes and decisions	Permanent	REG	Formal record of awards conferred	Permanent
A4.5	External examiner nominations, appointments, reports and School responses	AY + 10 years	DEAN	Evidence of standards for DAP scrutiny and QAA review	Review
A4.6	Programme approval, modification and periodic review documentation; approved programme specifications	Programme closed + 10 years; final programme specifications permanent	DEAN	Evidence of what was approved and promised to students; degree awarding powers	Permanent
A4.7	Module descriptors, handbooks, assessment briefs and timetables (each year)	Last student on that version completes + 6 years	PD	Evidence of what was taught and assessed; consumer law and complaints	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A4.8	Annual and continuous monitoring reports and action plans (including CMC records)	AY + 6 years	DEAN	Quality assurance evidence for OfS condition B3 and DAP scrutiny	Review
A4.9	Lecture and class recordings	End of academic year in which recorded + 1 year	PD	Teaching support; data minimisation (staff and student images)	Destroy
A4.10	Industry projects, internships and placement agreements and records	Agreement or placement end + 6 years	CAR	Limitation Act 1980; H&S and insurance claims	Destroy
A4.11	Student research ethics applications and approvals	Project end + 6 years	PD	Research integrity; sector practice	Destroy

A5. Human resources

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A5.1	Recruitment records for unsuccessful candidates (applications, shortlisting, interview notes, assessments)	12 months after the appointment decision	HR	Employment tribunal time limit is six months from 1 October 2026 (Employment Rights Act 2025), plus Acas early conciliation; Equality Act 2010	Destroy
A5.2	Vacancy files (job description, advert, shortlist and appointment decision)	Appointment + 1 year (successful candidate's records move to personnel file)	HR	Recruitment claims; sponsorship evidence where applicable	Destroy
A5.3	Right to work check records	End of employment + 2 years	HR	Home Office employer's guide on right to work checks (statutory excuse); Immigration, Asylum and Nationality Act 2006	Destroy
A5.4	Sponsored worker records (Skilled Worker and other worker routes)	Sponsorship end + 1 year, or until examined and approved by a UKVI compliance officer if earlier; longer where required by A5.5	HR	UKVI Sponsor Guidance Appendix D	Destroy
A5.5	Personnel file: contract and variations, offer letters, references, qualifications, probation, appraisals, training, family leave and flexible working requests	End of employment + 6 years	HR	Limitation Act 1980; employment claims; sector practice (LSE 7 years, most peers 6)	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A5.6	Summary employment record (name, dates of employment, roles, salary history)	End of employment + 75 years	HR	Pension queries, references and long-tail claims; sector practice (LSE 75 years)	Review
A5.7	Faculty and adjunct contracts, induction completion records and teaching allocation	Contract end + 6 years	HR / DEAN	Limitation Act 1980; evidence of staff qualifications for DAP and OfS quality conditions	Destroy
A5.8	Payroll, PAYE, P11D, P45/P60, salary and tax records	End of tax year + 6 years	CFO	HMRC (minimum 3 years for PAYE); Limitation Act 1980	Destroy
A5.9	Statutory sick, maternity, paternity, adoption and shared parental pay records	End of tax year + 6 years	HR / CFO	HMRC (minimum 3 years); Limitation Act 1980	Destroy
A5.10	Annual leave, holiday entitlement and holiday pay records	6 years from the date the record was made	HR	Employment Rights Act 2025 holiday record duty (in force 6 April 2026); criminal offence for non-compliance	Destroy
A5.11	National minimum wage records	6 years after the end of the pay reference period	HR / CFO	National Minimum Wage Regulations 2015 (as amended)	Destroy
A5.12	Working time records and 48-hour opt-out agreements	2 years from the date made (opt-outs: 2 years after withdrawal or end of employment)	HR	Working Time Regulations 1998 reg. 9	Destroy
A5.13	Pension auto-enrolment records (excluding opt-out notices)	6 years	HR / CFO	The Pensions Regulator record keeping requirements	Destroy
A5.14	Pension opt-out notices	4 years	HR	The Pensions Regulator record keeping requirements	Destroy
A5.15	Sickness absence, fit notes, occupational health and return to work records	End of employment + 6 years	HR	Equality Act 2010 and personal injury claims; special category data held with restricted access	Destroy
A5.16	Disciplinary, grievance, capability and whistleblowing case files	Case closed or end of employment (whichever later) + 6 years. Expired warnings are disregarded for future decisions	HR	Limitation Act 1980; employment claims	Destroy
A5.17	Settlement agreements, redundancy and tribunal records	Agreement or claim concluded + 6 years	HR	Limitation Act 1980	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A5.18	DBS checks (where required for a role)	Recruitment decision + 6 months; retain only a record that the check was made	HR	DBS Code of Practice	Destroy
A5.19	Mandatory and other training completion records (e.g. BrightHR)	End of employment + 6 years	HR	Evidence of compliance with statutory and regulatory training (data protection, Prevent, E6, H&S)	Destroy
A5.20	Pay and grading reviews, remuneration committee papers, gender pay information	CY + 6 years (committee minutes: A1.3)	HR / COO	Equal pay claims (six years from end of employment); audit trail	Destroy

A6. Finance

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A6.1	Annual statutory accounts, auditors' reports and letters of representation	Permanent	CFO	Companies Act 2006; institutional record	Permanent
A6.2	Accounting records: ledgers, invoices, receipts, bank statements, journals, purchase orders, expense claims	End of financial year + 6 years	CFO	Companies Act 2006 s.388 (minimum 3 years for a private company); HMRC corporation tax and VAT (6 years)	Destroy
A6.3	Budgets, forecasts, management accounts and financial sustainability evidence	FY + 6 years	CFO	OfS financial viability and sustainability conditions; audit trail	Destroy
A6.4	Tax returns, computations and HMRC correspondence	FY + 6 years (longer if an enquiry is open)	CFO	HMRC requirements	Destroy
A6.5	Fixed asset register	Disposal of asset + 6 years	CFO	Audit and tax	Destroy
A6.6	Bank mandates, signatory lists and delegated financial authorities	Superseded + 6 years	CFO	Audit trail; fraud prevention	Destroy
A6.7	Due diligence on payers, recruitment agents and third-party fee payments (including sanctions screening)	End of relationship + 5 years	CFO	Good practice aligned to the Money Laundering Regulations 2017 reg. 40 and UK sanctions regime	Destroy
A6.8	Supplier contracts and agreements	Contract end + 6 years (+ 12 years if executed as a deed)	CFO / contract owner	Limitation Act 1980 ss.5 and 8	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A6.9	Tender and procurement records	Successful: contract end + 6 years. Unsuccessful bids: award + 1 year	CFO	Challenge and audit	Destroy
A6.10	Payment card data	Do not store full card numbers or security codes	CFO	PCI DSS	N/A

A7. Estates, facilities and health and safety

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A7.1	Leases, licences, deeds and related legal documents for premises	Lease end + 12 years	COO	Limitation Act 1980 s.8 (deeds); dilapidations claims	Review
A7.2	Landlord and managing agent correspondence, service charge records, fit-out and alteration approvals	Lease end + 6 years	COO	Lease obligations and dilapidations	Destroy
A7.3	Accident and incident records, accident book entries and RIDDOR reports	Incident + 6 years (injured person under 18: until age 21 + 3 years, if later)	COO	RIDDOR 2013 (minimum 3 years); Limitation Act 1980 personal injury (3 years, extended for minors); insurance claims	Destroy
A7.4	Health and safety risk assessments, policies and annual H&S reports	Superseded + 3 years (annual reports to committee: A1.3)	COO	Health and Safety at Work etc. Act 1974; sector practice (Bristol)	Destroy
A7.5	COSHH assessments and any health surveillance or exposure records	40 years	COO	COSHH Regulations 2002 reg. 11	Destroy
A7.6	Fire risk assessments, fire alarm tests, drills and fire warden records	Superseded + 6 years	COO / IT	Regulatory Reform (Fire Safety) Order 2005; evidence in claims	Destroy
A7.7	Contractor permits to work, method statements and contractor risk assessments	Works completed + 3 years	IT	Evidence of control of contractors; sector practice	Destroy
A7.8	Equipment inspection and maintenance records (PAT testing, HVAC, first aid kits)	Superseded or equipment disposed + 3 years	IT	Provision and Use of Work Equipment Regulations 1998; evidence in claims	Destroy
A7.9	CCTV footage (School-operated systems)	Up to 31 days, unless required for an investigation	IT	ICO guidance on video surveillance; data minimisation	Destroy

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A7.10	Visitor logs, access control and ID card records	12 months	IT	Security; data minimisation	Destroy
A7.11	Room bookings, desk allocation and space records	CY + 1 year	IT	Business need	Destroy

A8. Information technology and security

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A8.1	Staff mailboxes and OneDrive after leaving	3 months after leaving (records transferred before deletion)	IT	Business continuity; data minimisation; sector practice	Destroy
A8.2	Student accounts (email, OneDrive, VLE access)	6 months after student departure	IT	Allows final results, appeals and transcript requests; data minimisation	Destroy
A8.3	System audit, access and security logs	12 months (longer if subject to an incident)	IT	Security monitoring; UK GDPR Article 32	Destroy
A8.4	Back-ups	Rolling, in line with the back-up schedule (not used as an archive)	IT	Business continuity; deleted data ceases to exist when back-ups expire	Destroy
A8.5	Information security incidents and cyber security assessments (e.g. Cyber Essentials)	Closed or superseded + 6 years	IT	Evidence for ICO, insurers and auditors	Destroy
A8.6	IT asset register and certificates of equipment disposal or data destruction	Disposal + 6 years	IT	Evidence of secure disposal	Destroy
A8.7	Software licences and IT service contracts	Expiry + 6 years	IT	Licence audit; Limitation Act 1980	Destroy
A8.8	System documentation, configuration and data migration records	System decommissioned + 6 years	IT	Ability to evidence integrity of migrated records (see section 12.2)	Review

A9. Marketing and communications

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A9.1	Marketing consent and preference records; suppression lists	Consent withdrawn or superseded + 2 years (suppression list retained while needed to honour opt-outs)	MKT	UK GDPR and PECR evidence of consent	Destroy
A9.2	Prospectuses, programme web pages and published course information (each year's version, including archived web captures)	Last student recruited under that information completes + 6 years	MKT	Consumer protection law and OfS consumer protection conditions (evidence of what was promised to students); complaints	Review
A9.3	Photographs and video featuring identifiable individuals, with consent forms	Consent period ends or 5 years from capture, whichever earlier	MKT	Consent; data minimisation	Destroy
A9.4	Newsletters, press releases and official publications	Permanent (one copy)	MKT	Institutional history	Permanent
A9.5	Campaign analytics and social media management data	CY + 2 years	MKT	Business need	Destroy

A10. Partnerships, agents and external relationships

Ref	Record type	Retention period (trigger)	Record Owner	Justification	Action at end
A10.1	Recruitment agent agreements, due diligence, training and performance records	Agreement end + 6 years	ADM	Limitation Act 1980; UKVI and OfS expectations on agent management; Agent Quality Framework	Destroy
A10.2	Agent commission calculations and payments	FY + 6 years	CFO	HMRC; audit	Destroy
A10.3	Academic partnership agreements, MoUs and articulation agreements	Agreement end + 6 years (+ 12 years if a deed); permanent where students received an award under the agreement	DEAN	Limitation Act 1980; evidence of the basis of awards	Review
A10.4	Corporate relations, employer and industry partner agreements	Agreement end + 6 years	CAR	Limitation Act 1980	Destroy

Appendix B: Disposal Log

Record Owners complete this log for any disposal of records with an action of "Review" or "Permanent", any bulk disposal, and any disposal of records held by third parties. The log is held by the Director of Compliance and Governance and retained permanently. Do not record personal data in the description; describe the class and date range only.

Date	Schedule ref	Description of records (class and date range)	Format and location	Volume (boxes / files / records)	Method of disposal	Authorised by (Record Owner)	Certificate / reference

Annual retention review confirmation (September)

Area / Record Owner	Schedule classes reviewed	Disposals completed (Y/N)	Legal holds in place (Y/N)	Issues or proposed schedule changes