



## Data Retention Policy

### 1. Context:

- a) This policy set outs the organisations policy, practices and processes in relation to data retention to ensure the Unions follows the notice given to students in the student contract and the privacy policy.

### 2. Retention Periods:

- a) The table below outlines the Unions data retention periods and associated actions.

Area of Data:	Retention Period:	Justification of Retention Period:	Responsibility:	Actions required to ensure compliance:
Student data records	Maximum of one week after course end date	Records are relevant while a student is still a member of the Students' Union.	Marketing and Communications	Ensure data files contain delete commands and the website database is automatically deleting students moved into the alumni Usergroup.
Student membership data	Maximum of one week after course end date	Records are relevant while a student is still a member of the Students' Union.	Marketing and Communications	Ensure data files contain delete commands and the website database is automatically deleting students moved into the alumni Usergroup.

Online student behaviour	Maximum of one week after course end date	Records are relevant while a student is still a member of the Students' Union.	Marketing and Communications	Ensure data files contain delete commands and the website database is automatically deleting students moved into the alumni Usergroup.
Guest accounts	Five years following last online interaction	To ensure accounts and records are not lost while users still wish to access them	Marketing and Communications	A monthly audit of guest account activities to ensure the deletion of accounts.
Guest online behaviour	Five years following last online interaction	To ensure accounts and records are not lost while users still wish to access them	Marketing and Communications	A monthly audit of guest account activities to ensure the deletion of accounts.
Loyalty and EPOS data	Maximum of one year	To ensure users can earn and use loyalty points within an annual financial year	Marketing and Communications	Annual clearing of loyalty database on the 1 <sup>st</sup> August each year.
Market research	Until research is analysed	Personal data not required to maintain insight of information gained.	Individual staff members	All personal data removed from all stored data related to the market research undertaken.
Online form submission	Eighteen months from submission.	Data kept for reasonable operational and administrative needs.	Marketing and Communications	Ensure Machform Server is set to automatically delete entries after 18 months.
Tickets purchased	Four years after the	To allow conformance	Marketing and Communications	A monthly audit of

and event attendance	completion of the event	with financial record keeping and the average student member period.		events to ensure the events more than four years old are deleted.
Employment application data	Eighteen months from submission.	To allow for requests for information and feedback to be successfully conducted and to hold effective and reliable HR files.	Marketing and Communications	Ensure Machform Server is set to automatically delete entries after 18 months.
Human resources record	Indefinite	For the use in legal and employment processes and to facilitate requests for references and other information,	HR and Finance	None.
Financial records	Five years	To ensure the Union can legally confirm and provide information for financial audits and HMRC requests.	HR and Finance	An annual audit of financial information held to ensure data of more than five years is confidentially removed.
Records on licence venue bans	Five years	To ensure compliance with licence requirements and to ensure a safe environment for students.	Venue Team	An annual audit of records of licence bans held to ensure data of more than five years is confidentially removed.
Advice case notes	Anonymised six years after the closure of the case	To ensure the student can be effectively represented.	Student Voice	None process is automated.

Student staff timesheets	Six years following employee being archived (employees are automatically archived after three months of no shift activity).	To ensure the Union legally confirms to financial record keeping.	HR and Finance	Annual audit to ensure staff are being automatically archived and deleted as appropriate.
Health and safety incidents and near misses	Five years following the incident	To ensure requests for information can be processed effectively.	All staff	An annual audit of business safe to ensure records are removed.
Records of media sales clients	Five years following the last booking of media space or asset.	To ensure effective communication between parties	Marketing and Communications	An annual audit of business safe to ensure records of organisations not used in the last five years is confidentially removed.
Photos and quotes provided for publications.	Indefinite	To promote the services the Union provides.	All staff	None.
Emails	Two years after sending or receiving	To ensure the process contained within the chain have ample time to be completed.	All Staff	Ensure automatic deletion is set within Outlook
Other data	To be confirmed	Any data collection not covered in this table will have a clear notice to users informing them of the retention period.	Relevant staff	Actions confirmed with the notice given.

### 3. Individual Staff Actions:

- a) Any staff members undertaking the following actions must ensure adherence to the retention policy through the following actions:
  - i. **Undertaking market research:** Once the market research has been analysed all entries should be deleted and any information within the analysed data that would allow an individual to be identified should be removed so that just the insight is kept. Once this action has been completed it requires recording online through the data reporting portal at [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).
  - ii. **Collecting and processing other forms of data not listed:** Not only will the employee need to gain informed consent before collecting and processing the data they will need to ensure the rights and principles of The General Data Protection Regulations are followed alongside ensuring arrangements are put into place in relation to the retention of data including the inclusion of recording such data collection and processing on the online data reporting portal [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).
  - iii. **Accident and Near Misses:** Any accident or near misses that the employee submitted that are five years old should be deleted from business safe and recorded on the online data reporting portal [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp). To ensure the requirement of this retention period employees should place a calendar reminder when logging the accident or near miss and undertake an annual audit of their submissions to ensure the correct removal dates have been recorded.

### 4. Departmental Actions:

- a) The Marketing and Communications Department will ensure the following:
  - i. Working with the Universities ICT department and One Voice Digital to ensure the operation of the Unions student data feed and where appropriate report any technical issues for resolution. In addition, all changes to student data records should be recorded online through the data reporting portal at [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).
  - ii. Put effective technological systems and procedures in place to ensure the guest accounts that have not been active for a period of five years are deleted from the Union main database. In addition, all guest accounts that are deleted should be recorded.
  - iii. Ensure the Unions loyalty data is deleted on an annual basis which will usually be the 1<sup>st</sup> August each year and record this has taken place and how many records were deleted. In addition all changes to student data records should be recorded online through the data reporting portal at [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).
  - iv. Put effective technological systems and procedures in place to ensure events that are concluded four years ago are deleted from the Union main database and recorded the events that are deleted online through the data reporting portal at [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).

- v. Put effective technological systems and procedures in place to ensure media sales contacts that the Union has had no contact with for five years are deleted and recorded online through the data reporting portal at [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).
- b) The Human Resources and Finance Department will ensure the following:
- i. Put effective technological systems and procedures in place to ensure all financial records are deleted after a period of five years and recorded the action online through the data reporting portal at [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).
  - ii. Put effective technological systems and procedures in place to ensure student staff timesheets are deleted after a period of five years and recorded the action online through the data reporting portal at [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).
- c) The Commercial Venue Department will ensure the following:
- i. Undertake an annual audit of records of banned individuals alongside putting in effective technological systems and procedures in place to ensure records of banned individuals are deleted after a period of five years and recorded the action online through the data reporting portal at [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).

**5. Employee Responsibilities:**

- a) All employees should make themselves aware of and understand the Union retention periods and policy.
- b) All staff should follow this policy fully and ensure their actions are in keeping with it. A breach of this policy could be deemed a matter of misconduct and this open for Union disciplinary processes.
- c) All employees further have a duty to report any concerns or bad practice they are aware of and should do without delay in writing to their relevant Senior Manager. A failure to disclose information or concerns could be deemed a matter of misconduct and this open for Union disciplinary processes.
- d) All employees must ensure their outlook account is set to automatically delete files after a two year calendar period.

**6. Record of Retention Actions:**

- a) All data retention actions should be online through the data reporting portal online at [www.bedssu.co.uk/drp](http://www.bedssu.co.uk/drp).

**7. Review:**

- a) This policy will be reviewed as a minimum every two calendar years.
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<b>Policy Number:</b>	<b>Approving Body:</b>	<b>Date Ratified by Board:</b>	<b>Renewal Date:</b>
29.V2	Senior Leadership Team	October 2018	October 2020