

Records Management Procedures

1. Scope of the Procedures

1.1 Purpose of the Procedures

Retention and disposal of records can have far-reaching consequences. The purpose of the Procedures is to provide clear guidance to all those who access University records. The Procedures detail how long these records need to be retained and document the reasons behind these decisions. Retention periods can be extended in consultation with the record owner and the General Counsel in the event of potential legal action.

1.2 What is covered by the Procedures

The Procedures apply to all records held by the University.

1.3 Who is covered by the Procedures

All those who access personal data held by the University, including staff, must familiarise themselves with the Procedures. Non-compliance with the Procedures will be dealt with in accordance with the University's Records Management Policy.

2. Acknowledgments

The Procedures take account of the University's business processes, legal and regulatory requirements and HE sector standard recommendations. The development of the Procedures has been subject to a lengthy consultation period to ensure that these Procedures meet the requirements of the University. This has only been possible because so many University staff have given their time and expertise to support this work.

3. Privacy Notices

The University publishes privacy notices that apply to the collection and retention of personal data. Records must be retained in accordance with the relevant privacy notice in addition to the Procedures set out below i.e. personal data can only be lawfully utilised by the University for the purposes set out to the data subject in the privacy notice and consent is freely given as required. The full list of the University's privacy notices are at <https://www2.aston.ac.uk/data-protection>.

4. **Detailed Procedures Statement**

The detailed Procedures are divided into sections in alphabetical order that relate to specific areas of activity at the University. There is an introductory paragraph at the beginning of each section, which provides an overview of the types of records in that particular section.

5. **Detailed Procedures**

Section 1: Academic Records

Section 2: Business Units

Section 3: Clinics

Section 4: Committee Records

Section 5: Estates Management

Section 6: Financial Management

Section 7: Health and Safety

Section 8: Legal and Compliance

Section 9: IT Services / Library Services / Technology Enhanced Learning Team

Section 10: Marketing and Communications

Section 11: People Management

Section 12: Research and Projects

Section 13: Student Services and Experience

Section 1
Academic Records

What this section covers:

Records relating to programmes, assessments, results, graduation records and feedback.

If Colleges have the same information that is held on SITS, then the information held in the School can be destroyed. If the information is more detailed however then it should be treated in accordance with Section 13: Student Services and Experience.

Owner:

Please direct enquiries in relation to this section to Director of Quality Assurance and Enhancement, the relevant Head of Administration in the School or the Director of Student and Academic Services (as appropriate).

Detailed procedures:

Section No.	Record	Owner/ holder	Retention	Reason
1.1	Programme specifications	CLIPP & Colleges	Review after the end of the life of the programme + 6 years.	Pedagogical purpose
1.2	Coursework submitted for assessment and any relevant Turnitin report	Colleges	Destroy after student leaves the University/ graduates + 1 year.	Best practice
1.3	Examination papers (i.e. the blank question papers) Refer to Section 13: Student Services and Experience for examination scripts	Colleges	Destroy after examination + 6 years.	Best practice

Section No.	Record	Owner/ holder	Retention	Reason
1.4	Records documenting the selection and appointment of internal and external examiners and independent chairs, including the design and delivery of training and the relevant privacy notice	CLIPP & Colleges	Destroy after the end of appointment + 6 years.	Best practice Limitation Act 1980 Data protection legislation
1.5	Examination timetables, records documenting liaison with examiners on administrative matters, records documenting the selection and appointment of examination invigilators and records concerning the control of examination papers and scripts	Student and Academic Services	Destroy after current academic year + 1 year.	Best practice
1.6	Records documenting individual students' attendance at examinations	Student and Academic Services	Destroy after current academic year + 1 year.	Best practice.
1.7	External Examiner reports (and Internal Examiner reports for postgraduate research students)	CLIPP & Colleges	Year to which the report applies + 6 years.	Limitation Act 1980 Data protection legislation
1.8	Records documenting the collation of examination results and compilation of pass lists and individual notifications of results	Colleges & Student and Academic Services / CLIPP & Colleges	Destroy after current academic year + 1 year.	Data protection legislation Best practice
1.9	Board of Examiners pass lists and award lists	Colleges & Student and Academic Services	Retained permanently in SITS.	Data protection legislation Limitation Act 1980 Best practice
1.10	Marks/ grades/ classifications awarded to students including reviews in response to notifications of mitigating circumstances or	Colleges & Student and Academic Services	The core student record is retained permanently in SITS, including assessment and module marks and	Data protection legislation Limitation Act 1980

Section No.	Record	Owner/ holder	Retention	Reason
	academic appeals		classifications. If Colleges have more detailed information, that information needs to be added to SITS as appropriate so those records can be treated as part of the student file and any duplicate records deleted.	
1.11	Prize nomination and recipient records including scholarship/ bursary awards records	Colleges, Student and Academic Services, Finance	Review after current year + 6 years. Some information will be needed to be added to the core student record in SITS for permanent retention and then transferred to Raiser's Edge.	Data protection legislation Limitation Act 1980
1.12	Lists of prize winners and HEAR information	Colleges & Student and Academic Services	Review annually and ensure that appropriate consent has been obtained if the record is to be retained permanently.	Data protection legislation Best practice
1.13	Formal record of degree ceremonies	Student and Academic Services	Permanent retention	Data protection legislation Best practice
1.14	Records relating to graduation ceremonies including: the process of inviting, receiving and considering nominations for honorary awards, production of certificates, responses to offers, organisation of award ceremonies and mailing of certificates to students who did not attend	Student and Academic Services	Permanently retained in SITS.	Data protection legislation Best practice
1.15	Taught programme feedback records from students, staff and examiners	Colleges, CLIPP & Student and Academic Services	Disposal after current year + 6 years. If data is required after this time, it must be anonymised.	Data protection legislation Limitation Act 1980

Section No.	Record	Owner/ holder	Retention	Reason
1.16	Lists of students who have graduated which are sent to regulatory bodies for example, the General Optical Council, the General Pharmaceutical Council and the General Medical Council	Colleges & Academic Services	Disposal after current year + 6 years	Data protection legislation Best practice

**Section 2
Business Units**

What this section covers:

Records relating to the University's business units – Sport Aston and Aston University Nursery and Pre-School

Owner

Please direct enquiries in relation to this section to the Director of Sport, Security and Nursery.

Detailed procedures:

Section No.	Record	Owner/ holder	Retention	Reason
2.1	Membership forms and completed privacy notices	Sport Aston	Destroy at the end of the membership	Best practice Data protection legislation
2.2	National Pool Lifeguard Qualification forms	Sport Aston	Destroy after date on the form + 7 years	Good practice
2.3	Car park forms	Sport Aston	Destroy at the end of the membership	Good practice
2.4	Complaints	Sport Aston	Destroy after the incident date + 6 years	Limitation Act 1980
2.5	Enquiry	Nursery	Destroy after date of enquiry + 6 months	Best practice
2.6	Completed privacy notices	Nursery	Destroy after child leaves the nursery	Best practice

Section No.	Record	Owner/ holder	Retention	Reason
2.7	Registration and supporting records	Nursery	Review and destruction will be in accordance with Ofsted Guidance	Childcare Act 2006 The Childcare (Early Years Register) Regulations 2008 The Childcare (Early Years and General Childcare Register) (Common Provisions) regulations 2008 (as amended)

**Section 3
Clinics**

What this section covers:

Records relating to the University's clinics including the Law Clinic.

Owner:

Please direct all enquiries in relation to this section to the appropriate clinic director.

Detailed procedures:

Section No.	Record	Owner/ holder	Retention	Reason
3.1	Patient records for Aston Brain & MRI Centre	Aston Brain & MRI Centre	Adults: Retention of records for 8 years after the conclusion of treatment or death (if sooner). Children: Retention of records until the patient is 25 or 26 if they were 17 on conclusion of treatment or 8 years after their death (if sooner).	NHS Standards and Guidance Data protection legislation Limitation Act 1980
3.2	Patient records for the Optometry Clinic	Optometry Clinic	Adults: Retention of records for 10 years after the patient was last seen even if the patient has subsequently died. Children: Retention of records for 10 years after the patient seen or until the patient is 25 (if later). If the child or young person has died, retain the records for 10 years after they were last seen.	College of Optometrists Standards and Guidance Data protection legislation Limitation Act 1980

Section No.	Record	Owner/ holder	Retention	Reason
3.3	Patient records for the Audiology Clinic	Audiology Clinic	Adults: Retention of records for 8 years after the conclusion of treatment or death (if sooner). Children: Retention of records until the patient is 25 or 26 if they were 17 on conclusion of treatment or 8 years after their death (if sooner).	Data protection legislation Limitation Act 1980
3.4	Files including legal advice to clients	Law Clinic	Date of last action on the file + 6 years	Limitation Act 1980 Data protection legislation

**Section 4
Committee Records**

What this section covers:

Records relating to committee administration; this includes committee minutes, agendas, supporting papers and other associated documentation. There will be committees relating to topics covered elsewhere in the procedures and, where necessary, these will be cross-referenced.

Owner:

Please direct all enquiries in relation to this section to the Director of Governance.

Detailed procedures:

Section No.	Record	Owner/ holder	Retention	Reason
4.1	All University Committee records, including: minutes, papers and agendas, development and establishment papers including constitutions, terms of reference, rules, procedures of Council, Senate, their sub-committees, Convocation and Executive.	Governance & Departments	Permanently. Governance will archive the master version of the papers for all Council, Council sub-committees that and Senate that they service so other departments should destroy duplicate copies of these when they are no longer needed. Relevant departments that service Senate sub-committees should retain a master version of the papers.	Historical value Data protection legislation

Section No.	Record	Owner/ holder	Retention	Reason
4.2	Records documenting the development and establishment of committees not listed in 4.1 including constitutions, terms of reference, rules, procedures, and any subsequent changes to these.	Colleges & Professional Services Departments	Review after end of life of committee + 6 years.	Data protection legislation Limitation Act 1980 Potential historic value
4.3	Minutes, papers and agendas of other Professional Services committees plus papers and agendas of the other central committees	Colleges & Professional Services Departments	Review after current year + 6 years.	Data protection legislation Limitation Act 1980 Potential historic value
4.4	Minutes, papers and agendas of school and departmental committees.	Colleges & Professional Services Departments	Review after current year + 6 years.	Data protection legislation Limitation Act 1980 Potential historic value
4.5	Minutes, papers and agendas of committees, boards or other groups set up specifically to manage a project	Colleges & Professional Services Departments	Review full set of records after the project completion date + 6 years	Data protection legislation Limitation Act 1980 Good practice
4.6	University Research Ethics Committee minutes, papers and agendas and School Research Ethics Committee minutes, papers and agendas	Relevant ethics committee(s)	Review full set of records after the project the closure date + 6 years for individual projects considered by the relevant Committee.	Data protection legislation Limitation Act 1980 Good practice

Section No.	Record	Owner/ holder	Retention	Reason
4.7	Sub committees and other working groups, informal staff meetings	Colleges & Professional Services Departments	Destroy once no longer required for reference.	Data protection legislation Limitation Act 1980 Good practice
4.8	Records documenting the arrangements for committee meetings e.g. room bookings, and associated correspondence	Colleges & Professional Services Departments	Destroy after current year +1 year.	Data protection legislation Limitation Act 1980 Good practice
4.9	Working papers, action sheets, correspondence and personal notes	Colleges & Professional Services Departments	Destroy once no longer required for reference.	Data protection legislation Limitation Act 1980 Good practice
4.10	Records documenting the appointment, election, designation of committee members	Colleges & Professional Services Departments	Destroy after termination of membership + 6 years.	Data protection legislation Limitation Act 1980 Good practice
4.11	Register of interests of members of Council and the Executive	Governance	Destroy/Review after termination of appointment + 6 years.	Data protection legislation Limitation Act 1980 Good practice

**Section 5
Estate Management**

What this section covers:

Records relating to buildings, facilities and equipment and security.

Owner:

Please direct enquiries in relation to this section to the Director of Estates or the Head of Security (as appropriate).

Detailed procedures:

Section No.	Record	Owner/ holder	Retention	Reason
5.1	Property title deeds	Office of the General Counsel	Permanently	Limitation Act 1980
5.2	Lease agreements	Estates / Office of the General Counsel	Termination/expiry of the lease + 12 years	Limitation Act 1980
5.3	Licences to occupy	Estates / Office of the General Counsel	Termination/expiry of the licence to occupy + 6 years	Limitation Act 1980
5.4	Property sale and purchase records	Finance / Office of the General Counsel /	Destroy after year of transaction + 12 years	Taxes Management Act 1970 c.9 s34

Section No.	Record	Owner/ holder	Retention	Reason
		Estates		
5.5	FM Works	Estates	Major works contracts entered into under seal: destroy after completion of works + 15 years. Minor works contracts executed under hand: destroy after completion of works + 6 years.	Limitation Act 1980; Best practice; 17th Ed IEE regulations; Gas Safety (Installation and Use) Regulations 1998 Approved Code of Practice and Guidance
5.6	Operations and Maintenance (O&M) Manuals/ Health & Safety Files	Estates	Destroy after disposal of property/ expiry/termination of a lease	SI 1994/3140 Construction (Design and Management) Regulations 2015 (from 6 April 2015, prior to that the 2012 Regulations apply); Best practice
5.7	Building records for example, floor plans, asbestos location plans and register, high voltage maintenance records and legionella location plans, reports and risk assessments	Estates	Destroy after disposal of property or hand over with property (as appropriate).	Control of Asbestos Regulations 2012; Electricity at Work Regulations 1989
5.8	Building condition surveys	Estates	Retain permanently and only destroy after disposal of property + 6 years	Limitation Act 1980 Best practice
5.9	Records documenting routine inspections of facilities	Estates	Destroy after completion of two subsequent inspections.	Best practice
5.10	CAD standards	Estates	Once replaced by new standard retain permanently, transfer to archive folder.	Best practice

Section No.	Record	Owner/ holder	Retention	Reason
5.11	Bill of reduction records	Estates	Destroy after current year + 6 years.	Limitation Act 1980
5.12	Maintenance planning records and works records	Estates	Destroy after completion of works + 5 years.	Limitation Act 1980 Best practice
5.13	Work orders	Estates	Destroy when no longer current + 2 years.	Best practice
5.14	Permits to work for Estates contractors	Estates	Destroy when no longer current + 3 years.	Management of Health and Safety at Work Regulations 1999
5.15	Air conditioning inspection certificates and CHPQA reports (and certification CRC Energy Efficiency Scheme)	Estates	Review after completion of two subsequent inspections or reports.	Provision and Use of Work Equipment Regulations 1998
5.16	European Emissions Trading Scheme (EU ETS)	Estates	Destroy after current year + 5 years.	Best practice
5.17	Meter readings	Estates	Destroy after current year + 5 years.	Best practice
5.18	Electrical certificates	Estates	Destroy once superseded + 5 years.	17th Ed IEE regulations; Best practice
5.19	Gas safety asset register	Estates	Retain permanently.	Gas appliances, Building Regulations Compliance Certificate; Gas Safety (Installation and Use) Regulations 1998 Approved Code of Practice and Guidance
5.20	Gas safety inspection report	Estates	Destroy after completion of inspection + 5 years.	Gas appliances, Building Regulations Compliance Certificate; Gas Safety (Installation and Use) Regulations 1998 Approved Code of Practice and Guidance

Section No.	Record	Owner/ holder	Retention	Reason
5.21	Gas safety testing certificates	Estates	Destroy once superseded + 5 years.	Gas appliances, Building Regulations Compliance Certificate; Gas Safety (Installation and Use) Regulations 1998 Approved Code of Practice and Guidance
5.22	High voltage access records	Estates	Review after access + 7 years	Best practice
5.23	Plant and equipment maintenance, testing and inspection certificates including PAT testing	Estates	Disposal after the lifetime of the equipment + 6 years	Electricity at Work Regulations 1998 and 17th Edition Wiring Regulations; Radiation Regulations Regulatory Reform (Fire Safety) Order (2005); Limitation Act 1980
5.24	Energy certificates and accompanying reports	Estates	Disposal after the current year + 7 years	Best practice
5.25	Waste management records documenting the storage and collection of special waste	Estates	Disposal after the removal of the waste + 6 years	Best practice Limitation Act 1980
5.26	Confidential waste receipts	Estates	Disposal after the removal of the waste + 12 months	Best practice
5.27	Legionella maintenance records, planned preventative maintenance works and temperature reading records	Estates	Review after creation of records + 7 years.	Best practice Control of Substances Hazardous to Health Regulations (CoSHH) 2012 Legionnaires' disease: The control of legionella bacteria in water systems Approved Code of Practice and Guidance
5.28	Lift inspection records	Estates	Destroy after inspection + 6 years.	Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 Limitation Act 1980

Section No.	Record	Owner/ holder	Retention	Reason
5.29	Pest control records	Estates	Destroy after current year + 2 years.	Prevention of Damage by Pests Act 1949
5.30	Pressure system inspection records	Estates	Destroy after completion of two subsequent inspections.	Best practice
5.31	Fire safety equipment maintenance checks and fire safety suppression systems records	Estates	Review after current year + 5 years	Required by the Regulatory Reform (Fire Safety) Order (2005)
5.32	Educational Maintenance Statistics reports	Estates	Destroy after collation + 1 year	Best practice
5.33	Bike register	Security	Destroy after the date of creation + 12 months	Best practice
5.34	Security Industry Authority license records	Security	Destroy after renewal	Best practice
5.35	Business continuity procedures	Security	Review after superseded + 10 years	Best practice
5.36	Bodycam and CCTV images	Security	Destroy after creation + 30 days unless the image is in respect of property damage or personal injury when it is be destroyed after creation + 3 years.	Best practice
5.37	Records of events in accordance with the Events Registration and Authorisation Procedure	Security	Destroy after the event + 6 years	Limitation Act 1980 Best practice
5.38	Records relating to security arrangements for events	Security	If a recurring event: review once superseded. If a one off event: review after event + 2 years.	Best practice

Section No.	Record	Owner/ holder	Retention	Reason
5.39	Records on the incident management system	Security	Destroy after last action on the incident + 6 years	Best practice
5.40	Lost and Found records	Security, Sport Aston	Destroy after the date the record was made + 30 days	Best practice
5.41	Radio messages	Security	Destroy after the date the recording + 30 days	Best practice
5.42	Record of a request for Security to review CCTV images and actions taken	Security	Retained for the period that the recording remains available	Best practice

Section 6
Financial Management

What this section covers:

Records relating to financial transactions. These records will contain sensitive information including pay details, bank accounts and student and supplier details as well as other information such as internal budgets and forecasts and credit control. This information will need to be updated and reviewed on a regular basis and be retained in accordance with legal requirements. Finance hold a significant number of records in Agresso.

Many of these records are held in Finance but original financial documentation and copies of the originals are widely held in other areas of the University. If copies are held, it is important to make sure that they are also managed in accordance with these procedures.

Owner:

Please direct enquiries in relation to this section to the Director of Finance. This section does not include reference to holders because copies of the originals are widely held in other areas of the University. Where copies are held, it is important to make sure that they are also managed in accordance with these procedures.

Detailed procedures:

Section No.	Record	Retention	Reason
6.1	Accounts payable	Destroy after the current year + 6 years	Limitation Act 1980 HM Revenue and Customs 700/21 para. 5.2
6.2	Treasury and cash management	Destroy after the current year + 6 years	HM Revenue and Customs 700/21 para. 5.2

Section No.	Record	Retention	Reason
6.3	Credit control	Destroy after the current year + 6 years	Limitation Act 1980 HM Revenue and Customs 700/21 para. 5.2
6.4	Departmental budgets	Destroy after the current year + 6 years	Best practice
6.5	Monthly reporting including journal posting	Destroy after the current year + 6 years	HM Revenue and Customs 700/21 para. 5.2
6.6	Payment details including national insurance	Destroy after the current year + 6 years	Limitation Act 1980 HM Revenue and Customs 700/21 para. 5.2
6.7	Insurance certificates	Permanently	Best practice
6.8	Internal budgets and forecasts	Destroy after the current year + 6 years	Best practice
6.9	Quotations and tenders	If unsuccessful, destroy 1 year after exercise of the purchase or contract. If successful, retain for 6 years after expiry/termination of the associated contract.	Best practice
6.10	Student fee payments	Destroy after current year + 6 years	Limitation Act 1980 Taxes Management Act 1970 c.9 s34;
6.11	Tax returns	Destroy after current year + 6 years	Taxes Management Act 1970 c.9 s34
6.12	Research grants claims and evidence	Non ERDF claims - Destroy after current year + 6 years ERDF claims – Refer to Section 12: Research and Projects	Limitation Act 1980

Section 7
Health and Safety

What this section covers:

Records relating to health and safety.

There are strict legal requirements for the retention of health and safety documents. In the event that the records are not retained for the period of time required by legislation, the University will be in breach of its obligations under the relevant laws and will face penalties.

Staff are therefore required to ensure that records are kept up to date and accurately document incidents and accidents. Staff are required to ensure that reminders are set to ensure accident reports are destroyed in accordance with the time limits after the events.

Owner:

Please direct enquiries in relation to this section to the Director of Health, Safety and Business Continuity. This section does not include reference to holders because all records are to be held by Health and Safety only.

Detailed procedures:

Section No.	Record	Retention	Reason
7.1	Accident forms and reports	Destroy after the date of the incident + 3 years, or until the injured person reaches age 21 (whichever is the later).	Limitation Act 1980
7.2	CCTV footage regarding injury claims	Destroy after the date of the incident + 3 years.	Limitation Act 1980
7.3	CCTV footage regarding property claims	Destroy after the date of the incident + 6 years.	Limitation Act 1980

Section No.	Record	Retention	Reason
7.4	Control of substances hazardous to health – Personal health records under occupational health surveillance	Retained for a period of 40 years from the date of last entry.	Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended)
7.5	Ionising radiation records – personal monitoring data for Classified Workers	Retained until the person to whom the record relates has or would have attained the age of 75 years but in any event for at least 30 years from when the record was made	Ionising Radiations Regulations 2017 (as amended)
7.6	Ionising radiation records – personal monitoring data for Non-Classified Workers	Retained for a period of 2 years from the date of last entry.	Ionising Radiations Regulations 2017 (as amended)
7.7	Minutes of meetings of Health and Safety Committee	Destroy after the date of the meeting + 5 years	Best practice
7.8	Risk assessments	Destroy after the date of the risk assessment + 3 years	Management of Health and Safety at Work Regulations 1999 Best practice

Section 8
Legal and Compliance

What this section covers:

Records relevant to the University's regulatory and legal compliance and legal risk management.

Owner

Please direct enquiries in relation to this section to the General Counsel. This section does not include reference to holders because all records are to be held by the Office of the General Counsel only.

Section No.	Record	Retention	Reason
8.1	Deeds	Destroy on expiry/termination of the deed + 12 years	Limitation Act 1980
8.2	Agreements	Destroy on expiry/termination of the contract + 6 years	Limitation Act 1980
8.3	Application of the seal	Permanently	Best practice
8.4	Share certificates	For the period of ownership of shares	Best practice

Section 9
IT Services / Library Services / Technology Enhanced Learning Team

What this section covers:

Records relating to information held within the University’s Library, Information Services and Technology-Enhanced Learning systems.

Owner

Please direct enquiries in relation to this section to the Director of Information Technology Services, the Director of Information Resources and Research Services, the Director of Customer Services And Liaison (Library Services) or the Technology-Enhanced Learning Manager (as appropriate).

Detailed procedures:

Section No.	Record	Owner/ holder	Retention	Reason
9.1	Access by University issued identification cards	Information Services / Security	Destroy after the date of access + 12 months	Best practice Data protection legislation
9.2	Records of Wi-Fi network login details and details of sites accesses on Wi-Fi networks	Information Services	Destroy after the date of access + 28 days	Best practice Data protection legislation
9.3	Box accounts held by members of staff	Information Services	Destroy after the date that the member of staff leaves the University + 90 days	Best practice Data protection legislation
9.4	Call monitoring logs	Information Services	Destroy after the date of creation + 28 days	Best practice Data protection legislation
9.5	Emails	Information Services	Review and file in appropriate University maintained systems within 12 months of the date of the email or delete	Best practice Data protection legislation

Section No.	Record	Owner/ holder	Retention	Reason
9.6	Tiger Pro	Information Services	Destroy after the date of access + 2 years	Best practice Data protection legislation
9.7	SITS	Information Services / Student and Academic Services	Permanent	Fundamental University purpose
9.8	Panopto (Aston Replay)	Technology-Enhanced Learning	Destroy after the date of the recording + 3 years	Pedagogical purpose Data protection legislation Best practice
9.9	Blackboard Learn	Technology-Enhanced Learning	Destroy after date of the record + 2 years unless it is coursework submitted for assessment, which is to be destroyed in accordance with section 1.2.	Pedagogical purpose Data protection legislation Best practice
9.10	Blackboard Collaborate	Technology-Enhanced Learning	Destroy after date of the record + 2 years unless it is coursework submitted for assessment, which is to be destroyed in accordance with section 1.2.	Pedagogical purpose Data protection legislation Best practice
9.11	The University's copy of any report from Turnitin	Technology-Enhanced Learning	Destroy in accordance with section 1.2 as this relates to assessment records.	Pedagogical purpose Data protection legislation Best practice
9.12	Kaltura	Technology-Enhanced Learning	Review after date of recording + 3 years	Pedagogical purpose Data protection legislation Best practice
9.13	Doodle Poll	Information Services	Destroy after the date of meeting + 30 days	Best practice Data protection legislation
9.14	Publication in EPrints	Library	Permanently subject to EPrints retention rules	Fundamental University purpose
9.15	Filemaker Pro	Library	Destroy for a period of 30 days after enquiry has been resolved	Best practice Data protection legislation

Section No.	Record	Owner/ holder	Retention	Reason
9.16	LibAnswers	Library		Best practice Data protection legislation
9.17	LibChat	Library		Best practice Data protection legislation
9.18	LibCal	Library	Date of creation of the record + 2 weeks	Best practice Data protection legislation
9.19	Online visitor forms	Library	Retained until the end of each academic year.	Best practice Data protection legislation
9.20	Sierra account for visitors	Library	Retained until end date of visit which is specified on the visitors online form.	Best practice Data protection legislation
9.21	Sierra vendor and electronic resource management records	Library	Retained until Sierra system is obsolete.	Best practice Data protection legislation
9.22	Student user account on printing system	Information Services	Destroyed 90 days after the end of the student's relationship with the University	Best practice Data protection legislation Limitation Act 1980
9.23	Student library loans: books outstanding and unpaid fines	Library	Destroyed 6 years after from the end of the student's relationship with the University in consultation with Student and Academic Services	Best practice Data protection legislation
9.24	Details of the activity on the Student Open Athens, Student Sierra and Talis Aspire accounts	Library	Destroyed 90 days after the end of the student's relationship with the University.	Best practice Data protection legislation
9.25	PhD theses	Library	Retained permanently	Best practice

Section No.	Record	Owner/ holder	Retention	Reason
9.26	Records of customer incidents and requests to the IT Helpdesk	Information Services	Destroy after the date of the last action on the record + 3 years	Best practice Management of IT assets

Section 10

Marketing and Communications

What this section covers:

Records relating to marketing, communications, conferences and events.

The Marketing team work closely with other teams at the University such as Alumni, Careers + Placements, International and Student Recruitment & Outreach on the retention and disposal of records of prospective students and graduates.

Records of prospective students captured in our Customer Relationship Management (CRM) system and bought from third party suppliers will be retained by Marketing until the prospective student enrolls and is recorded in SITS and will then become subject to the associated retention procedures. Marketing will retain the records of prospective students not yet enrolled at the University. There can be a longer lead-time for some prospective students to commit to a course at the University (especially Masters courses and doctorates) so their records will be kept for a maximum of five years after their last contact with the University.

Photographs and assets collected by the Marketing team will be stored in an asset management system. This will allow best practice in retention of images and other marketing collateral.

It is the responsibility of document owners to ensure documents published on the University's website are kept up to date. The Drupal Content Management System (CMS) has the functionality to alert document owners of retention and disposal dates however, the University's Digital Marketing team will audit key documents on an annual basis as an additional check that documents have been updated.

The Market Research Office will destroy records of individual survey responses within two years of submission of the response. The aggregated data will be pseudonymised and anonymised where appropriate to avoid the identification of individuals.

Owner

Please direct enquiries in relation to this section to the Director of Marketing.

Detailed procedures:

Section No.	Record	Owner/ holder	Retention	Reason
10.1	Leads provided through CRM systems and from third party suppliers	Marketing	Destroy after date of last contact with the University + 3 years	Best practice Data protection legislation
10.2	Contact details of journalists	Marketing	Retained on an ongoing basis and reviewed annually	Best practice Data protection legislation
10.3	Records of members of the public attending event open to the public	Marketing	Destroy after date of event + 1 year	Best practice Data protection legislation
10.4	Paper based questionnaires and electronic survey responses	Marketing	Destroy after date of completion of the questionnaire/survey + 2 years	Best practice Data protection legislation
10.5	Photograph/personal images	Marketing	Destroy after date of the photograph/image + 5 years	Best practice Data protection legislation
10.6	Website forms relating to requests for prospectuses and interests in events	Marketing	Destroy after date of the record + 12 months	Best practice Data protection legislation
10.7	Website pages visited and associated social media accounts	Marketing	Destroy after date of the record + 1 year	Best practice Data protection legislation
10.8	Media privacy notice	Marketing	Destroy after date of signature + 5 years	Best practice Data protection legislation

Section No.	Record	Owner/ holder	Retention	Reason
10.9	Personal details of an individual attending a conference/event and associated privacy notice	Marketing / Colleges & Departments	Destroy in accordance with the requirements of the completed relevant privacy notice.	Best practice Data protection legislation

**Section 11
People Management**

What this section covers:

Records relating to employees, workers and job applicants including recruitment information; details of any pre-employment checks; pay details; performance and training history; and details of any termination payments.

Owner:

Please direct enquiries in relation to this section to Director of Human Resources. This section does not include reference to holders because all records are to be held by Human Resources only.

Detailed procedures:

Payroll

Section No	Record	Retention Period	Reason
11.1	Payroll transaction records	Destroy after a period of 6 years plus the current tax year.	Limitation Act 1980

Employee Information

Contract

Section No	Record	Retention Period	Reason
11.2	Application Form	Destroy after a period of 6 years from the employee's leaving date.	Limitation Act 1980 Equality Act 2010 Employment Rights Act 1996
11.3	Qualifications		
11.4	Job description and specification		

Section No	Record	Retention Period	Reason
11.5	Signed contract of employment		
11.6	Confirmation of start date		
11.7	Acceptance letters		
11.8	End of contract details, including reason for leaving, a copy of any termination or resignation letter and details of any redundancy payment (if applicable)		

Employment Checks

Section No.	Record	Retention Period	Reason
11.9	UKVI checks (passports, visas)	Destroy after a period of 6 years from the employee's leaving date.	Immigration, Asylum and Nationality Act 2006 Immigration Act 2014 Immigration Act 2016 UKVI Codes of Practice
11.10	Records associated with employees sponsored for immigration purposes. Details of documents to be retained can be provided by the Recruitment team.	Destroy after the shorter of: 1 year from the date on which we end our sponsorship of the individual; and if the migrant is no longer sponsored by us, the point at which a compliance officer has examined and approved the records.	Immigration, Asylum and Nationality Act 2006 Immigration Act 2014 Immigration Act 2016 UKVI Codes of Practice
11.11	DBS Checks	All DBS certificates are stored by our external provider, GBG. No DBS certificates should be stored on site.	DBS Code of Practice
11.12	Health Checks (PAM)	Destroy after a period of 6 years from the employee's leaving	Limitation Act 1980

Section No.	Record	Retention Period	Reason
		date.	Equality Act 2010

Employee details

Section No.	Record	Retention Period	Reason
11.13	Personal details (including address, contact information, marital status, photo etc)	Destroy after a period of 6 years from the employee's leaving date.	Limitation Act 1980 Equality Act 2010 In order to retain the ability to communicate with the employee for a limited period after leaving.
11.14	Equality and diversity profile		
11.15	Digital documents and privacy notices (including copies of qualifications, marriage certificates etc)		

Employment History

Section No.	Record	Retention Period	Reason
11.16	Amendments to contractual terms (pay, benefits, working hours, HERA)	Destroy after a period of 6 years from the employee's leaving date.	Limitation Act 1980 Equality Act 2010
11.17	Training attendance		

Section No.	Record	Retention Period	Reason
11.18	Performance appraisals		
11.19	Absence details, including any Fit Notes and Occupational Health reports		
11.20	Personal development		

Employee Relations

Section No.	Record	Retention Period	Reason
11.21	Grievance, disciplinary and performance management	Destroy after a period of 6 years from the employee's leaving date.	Equality Act 2010 University may need to demonstrate how historical cases of discrimination have been dealt with.
11.22	Disciplinary records where a safeguarding issue has been raised	Destroy after a period of 6 years from the employee's leaving date.	Equality Act 2010 University may need to demonstrate how historical cases of discrimination have been dealt with.

Recruitment Records

Site Users

Section No.	Record	Retention Period	Reason
11.23	Site registration details	User accounts which are inactive for a period of 12 months will be deleted.	Data protection legislation
11.24	Subscription to alerts and RSS feeds		

Applicants

Section No.	Record	Retention Period	Reason
11.25	Application forms	Destroy after 9 months from the date that the successful applicant commences employment. If the successful applicant is on a sponsored work permit then the documents may need to be retained for longer. Please see Employment Information above.	Equality Act 2010 Immigration, Nationality and Asylum Act 2006 Immigration Act 2014 Immigration Act 2016 UKVI Codes of Practice
11.26	CVs and other attachments		
11.27	Interview notes		
11.28	Job offer		
11.29	References		
11.30	Shortlisting		

Organisation Change

Section No.	Record	Retention Period	Reason
11.31	Restructures and consultations	All personal information to be deleted 12 months after change exercise is concluded. Details of the organisational change to be retained indefinitely.	Employment Rights Act 1996 Equality Act 2010 Staff training and development purposes

Exemptions

Section No.	Record	Retention Period	Reason
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11.32	Settlement Agreements	Destroy after a period of 6 years from the employee's leaving date.	<p>Limitation Act 1980 In order to comply with terms of settlement agreement in respect of agreed references. In case of any appeal against a Tribunal judgment. Staff training and development purposes.</p>
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Section 12 Research and Projects

What this section covers:

Records relating to research and projects (funded or otherwise) of the following types:

- (a) projects involving ethics approval, human tissue or Health Research Authority approval for all funders other than those in 12.5, 12.6 or 12.7 (section 12.1);
- (b) projects **other than** those involving ethics approval, human tissue or Health Research Authority approval for all funders other than those in 12.5, 12.6 or 12.7 (section 12.2);
- (c) European Funded Projects for the 2007 – 2013 programmes, their implementation and financing, including ERDF projects (section 12.5);
- (d) European Funded Projects for the 2014 – 2020 programmes, their implementation and financing, including ERDF projects (section 12.6); and
- (e) projects operating under a state aid scheme in accordance with the General Block Exemption (Commission Regulation (EU) No 651/2014) or De Minimis Regulation (Commission Regulation (EU) No 1407/2013) (section 12.7).

Researchers should consider which of these five categories is appropriate for their project and if necessary should seek advice from Research and Knowledge Exchange or the Director of Information Resources and Research Services, as appropriate.

Owner:

Please direct enquiries in relation to this section to the Pro-Vice-Chancellor (Research) or the General Counsel.

Detailed procedures:

Section No.	Record	Owner/ holder	Retention	Reason
12.1	Records for projects involving ethics approval, human tissue or Health Research Authority approval	Lead researcher for the project	Destroy on the date of project closure + 6 years, other than in the event that research data records are made “open” for the purposes of open access, in which case, records should be retained in accordance with the Research Data Management Policy.	Best practice Data protection legislation University Research Ethics Committee recommendations Health Research Authority Committee recommendations
12.2	Records for projects other than those involving ethics approval, human tissue or Health Research Authority approval			
12.3	Privacy notices including consents for any non-medical research project			
12.4	Privacy notices including consents for any medical research project including clinical trials			

Section No.	Record	Owner/ holder	Retention	Reason
12.5	Original documents relating to all European Funded Projects for the 2007 – 2013 programmes, their implementation and financing, including ERDF projects.	Lead researcher on the project	Destroy on the date of programme closure + 3 years or 31 December 2025 (whichever is the later) other than in the event that research data records are made “open” for the purposes of open access, in which case, records should be retained in accordance with the Research Data Management Policy.	Regulation (EU) No 1303/2013
12.6	Original documents relating to all European Funded Projects for the 2014 – 2020 programmes, their implementation and financing, including ERDF projects.	Lead researcher on the project	Each project is given its own date for document retention so records must be retained in accordingly other than in the event that research data records are made “open” for the purposes of open access, in which case, records should be retained in accordance with the Research Data Management Policy.	Regulation (EU) No 1303/2013
12.7	Detailed records of any project operating under a state aid scheme in accordance with the General Block Exemption (Commission Regulation (EU) No 651/2014) or De Minimis Regulation (Commission Regulation (EU) No 1407/2013) and supporting documents	Lead researcher on the project	Destroy on the date that the last aid was granted under the scheme + 10 years other than in the event that research data records are made “open” for the purposes of open access, in which case, records should be retained in accordance with the Research Data Management Policy.	Commission Regulation (EU) No 651/2014 Commission Regulation (EU) No 1407/2013

Section No.	Record	Owner/ holder	Retention	Reason
12.8	Applications to the University Research Ethics Committee and the Colleges Research Ethics Committees	Lead researcher for the project / relevant ethics committee	Destroy on date of the end of study report + 6 years	University Research Ethics Committee recommendation Best practice Data protection legislation
12.9	Health Research Authority applications approvals including names, contact details and CVs	Research and Knowledge Exchange	Destroy on the date of project closure + 6 years	Health Research Authority Requirements Good Clinical Practice Standards Limitation Act 1980 Best practice
12.10	Good clinical practice (GCP) master and site file including CVs, training certificates, and research passport information	Research and Knowledge Exchange / lead researcher for project		
12.11	GOP training certificates	Lead researcher for the project	Destroy on the date of issue of the certificate + 3 years	Health Research Authority Requirements Good Clinical Practice Standards Data protection legislation Best practice
12.12	Any other GOP records including any paper files	Lead researcher for the project	Destroy on project closure	
12.13	Research passport applications	Lead researcher for the project	Destroy on completion of the relevant validation	Data protection legislation Good practice
12.14	Monitoring and audit reports	Research and Knowledge Exchange	Destroy on the date of project closure + 6 years	Health Research Authority Requirements Limitation Act 1980 Good practice

Section No.	Record	Owner/ holder	Retention	Reason
12.15	Approval for research involving NHS and/or Social Care organisations; Clinical Trials of Investigational Medicinal Products; Regulated Medical Device Trials; and research involving participants who do not have capacity to provide informed consent	Research and Knowledge Exchange / lead researcher for project	Destroy on the date of project closure + 6 years	Health Research Authority Requirements Good Clinical Practice Standards Data protection legislation Best practice
12.16	Confirmation form from NHS giving permission to University students and/or staff to undertake a Service Evaluation or Clinical Audit on their behalf			
12.17	NHS Clinical Evaluation			
12.18	NHS Service Evaluation			
12.19	Designated individual approval for research with human tissue	Research and Knowledge Exchange	Destroy on the date of project closure + 6 years	Human Tissue Act 2004 Limitation Act 1980 Best practice
12.20	Human Tissue Act Oversight Group agenda and minutes	Research and Knowledge Exchange	Permanently	Human Tissue Act 2004 Best practice

Section No.	Record	Owner/ holder	Retention	Reason
12.21	Human Tissue Act training certificates	Research and Knowledge Exchange / Lead researcher on the project	Destroy on date of certificate + 3 years	HTA Quality Manual Procedures Best practice
12.22	Participant information sheets	Lead researcher on the project	Destroy on the date of project closure + 6 years	Limitation Act 1980 Best practice
12.23	Paper files required to comply with HTA Quality Manual procedures	Lead researcher on the project	Destroy on the date of project closure + 6 years	
12.24	Sign in sheets for internal courses	Lead researcher on the project	Destroy on the date of course + 3 years	Data protection legislation Best practice
12.25	Training certificates	Lead researcher on the project	Destroy on the date of the certificate + 3 years	
12.26	Adverse Event Management and Adverse Event Form for any project governed by the Human Tissue Act 2004	Research and Knowledge Exchange / Lead researcher on the project	Destroy on the date of project closure + 6 years	Human Tissue Act 2004 Limitation Act 1980
12.27	Any complaint in respect of any project governed by the Human Tissue Act 2004	Research and Knowledge Exchange / Lead researcher on the project	Destroy on the date of project closure + 6 years	

Section 13

Student Services and Experience

What this section covers:

Records relating to students and graduates.

Owner:

Please direct enquiries in relation to:

- the section entitled “Admissions Recruitment and Outreach” to the Director of Admissions Recruitment and Outreach or the Director of Student and Academic Services (as appropriate);
- the section entitled “Student Experience” to the Director of Student and Academic Services;
- the section entitled “Employability” to the Director of Student Employability; and
- the section entitled “Alumni” to the Director of Support Engagement and Operations.

Detailed procedures:

Role of SITS

The Strategic Information Technology Services System (“SITS”) is the primary system designated by the University to maintain student records. Strict retention periods apply to reports generated from SITS including business objects reports. It is imperative that such reports are utilised solely for the specific purpose for which they were generated and then destroyed. They must not be used for any other purpose or otherwise retained, for example, as attachments to emails.

Role of Raiser’s Edge

Raiser’s Edge is the system designated by the University to maintain alumni records. Strict retention periods apply to reports generated from Raiser’s Edge. It is imperative that such reports are utilised solely for the specific purpose for which they were generated and then destroyed. They must not be used for any other purpose or otherwise retained, for example, as attachments to emails.

Admissions, Recruitment and Outreach

Section No.	Record	Owner / holder	Retention	Reason
13.1	Feeder School information	Admissions, Recruitment and Outreach	Review with a view to update/deletion every 12 months	Best practice Data protection legislation
13.2	Open day attendance records	Admissions, Recruitment and Outreach / Marketing and Communications / Colleges	Retained for a period of 12 months and disposed of in May each academic year.	Best practice Data protection legislation
13.3	Prospectus request forms	Admissions, Recruitment and Outreach / Marketing and Communications / Colleges	Destroy on the date of the request + 12 months	Best practice Data protection legislation
13.4	Details obtained at fairs including UCAS fairs and postgraduate fairs	Admissions, Recruitment and Outreach	Subject to completion of the relevant privacy notice, retained for a period of 3 years after the date of the fair	Best practice Data protection legislation
13.5	Applications for admission: successful	Admissions, Recruitment and Outreach / Colleges	Applications are retained for a period of 6 years from the student's end of relationship with the University	Best practice Data protection legislation Limitation Act 1980
13.6	Applications for admission: successful but deferred	Admissions, Recruitment and Outreach / Colleges	Destroy after completion of admissions process + 1 year for applicants through UCAS or completion of admissions process + 5 years for applications who have not applied through UCAS	Equality Act 2010 UCAS Rules Best practice Data protection legislation

Section No.	Record	Owner / holder	Retention	Reason
13.7	Applications for admission: unsuccessful	Admissions, Recruitment and Outreach / Colleges	Destroy after completion of admissions process + 1 year for applicants through UCAS or completion of admissions process + 5 years for applications who have not applied through UCAS	Equality Act 2010 UCAS Rules Best practice Data protection legislation
13.8	Applications for admission: withdrawn	Admissions, Recruitment and Outreach / Colleges	Destroy after application withdrawn + 6 years	Best practice Limitation Act 1980
13.9	Offer letter and attachments including clearing offers in the applicant record in SITS	Admissions, Recruitment and Outreach / Colleges	Destroy after the end of the student's relationship with the University + 6 years	Limitation Act 1980 Data protection legislation Best practice
13.10	Applicants exam results	Admissions, Recruitment and Outreach / Colleges		
13.11	Accommodation forms	Admissions, Recruitment and Outreach / Colleges		
13.12	Interview notes and records	Admissions, Recruitment and Outreach / Colleges		
13.13	Application forms that include reference to any criminal conviction	Admissions, Recruitment and Outreach / Colleges		
13.14	Records relating to DBS (Disclosure and Barring Service) checks and certificates	Student and Academic Services / Colleges		
13.15	Fees status assessment: those who do not become registered	Student and Academic Services / Colleges	Destroy after the start of the academic cycle in which the student was expect to register + 1 year	Data protection legislation Best practice

Section No.	Record	Owner / holder	Retention	Reason
	students			
13.16	Fees status assessment: registered students	Student and Academic Services / Colleges	Retained permanently in SITS	Data protection legislation Limitation Act 1980 Best practice
13.17	Records documenting the handling of applications for loans from the Student Loan Company	Finance	Retained for a period of 6 years following the date of application and where the application was successful included in the student's record in SITS	Data protection legislation Limitation Act 1980 Best practice
13.18	Appointment of supervisors for research students	Graduate School / Colleges	Retained in the student's permanent record in SITS	Limitation Act 1980 Best practice

Student Experience

Visa Advice

Section No.	Record	Owner / holder	Retention	Reason
13.19	Advice given to a student in respect of a visa application or an extension of a visa that has already been granted	Student and Academic Services	Destroy after the end of the student's relationship with the University + 6 years	Best practice Data protection legislation Limitation Act 1980
13.20	Tier 4 Visa	Student and Academic Services	Destroy after the visa is inspected or for a period of 12 months following the visa's expiry date (whichever is the shorter)	UKVI Codes of Practice
13.21	UKVI applications	Student and Academic Services	Destroy after the end of the student's relationship with the University + 6 years	UKVI Codes of Practice Limitation Act 1980
13.22	CAS Questionnaires	Student and Academic Services	Destroy after the end of the student's relationship with the University + 12 months	UKVI Codes of Practice

Attendance

Section No.	Record	Owner / holder	Retention	Reason
13.23	Attendance recording	Technology-Enhanced Learning / Colleges	Destroy after the end of the student's relationship with the University + 6 years	Best practice Data protection legislation Limitation Act 1980
13.24	Leave of absence	Student Administration & Support		
13.25	Welcome week attendance	Student Administration & Support		

Enabling and Student Wellbeing

Section No.	Record	Owner / holder	Retention	Reason
13.26	Strictly confidential disclosed personal information	Student and Academic Services / Colleges	Destroy after the end of the student's relationship with the University + 6 years	Best practice Data protection legislation Limitation Act 1980

Events

Section No.	Record	Owner / holder	Retention	Reason
13.27	Eventbrite events	Student and Academic Services / Colleges	Destroy after the end of the student's relationship with the University + 6 years	Best practice Data protection legislation

Section No.	Record	Owner / holder	Retention	Reason
13.28	Future events and placement systems	Student and Academic Services / Employability / Colleges		Limitation Act 1980
13.29	Event data capture forms	Student and Academic Services / Employability / Colleges	Destroy after the end of the student's relationship with the University + 12 months. Hard copies of forms are destroyed immediately as soon as information is uploaded.	Best practice Data protection legislation

Study

Section No.	Record	Owner / holder	Retention	Reason
13.30	Records documenting academic advice and guidance to individual students on the selection of research subjects, the progress and standard of their work, the conduct of research students' formal assessments, and examination reports	Student and Academic Services / Graduate School / Colleges	Review after the end of the student's relationship with the University + 6 years and ensure that the key information is uploaded to SITS and the other information destroyed.	Best practice Data protection legislation Limitation Act 1980
13.31	Feedback on academic progress, supervision meetings	Student and Academic Services / Graduate School / Colleges	Destroy after the student leaves the University/ graduates + 6 years.	Limitation Act 1980
13.32	Details of mitigating circumstances, student complaints,	Student and Academic Services / Graduate School / Colleges	Destroy after the end of the student's relationship with the University + 6 years	Best practice Data protection legislation Limitation Act 1980

Section No.	Record	Owner / holder	Retention	Reason
	OIA complaints, student appeals, and student disciplinary records			
13.33	Evidence to support mitigating circumstances, including special circumstances records, NHS fit notes, correspondence provided by students, reports from external bodies e.g. GPs or external counsellors	Student and Academic Services / Graduate School / Colleges	If the mitigating circumstances are upheld - Destroy after the end of the student's relationship with the University + 6 years If the mitigating circumstances are upheld - Destroy after within a year of submission of the evidence	Best practice Data protection legislation Limitation Act 1980
13.34	Examination scripts (i.e. the students' completed answers) and other assessed work including dissertations that count towards the final award.	Student and Academic Services / Graduate School / Colleges	Destroy after the student has left the University/graduates + 1 year	Best practice
13.35	PhD theses	Library	Retained permanently	Best practice

Employability

Section No.	Record	Owner / holder	Retention	Reason
13.36	Details of placements and any associated agreements	Employability	Retained for a period of 6 years from the student's end of relationship with the University.	Best practice Data protection legislation Limitation Act 1980
13.37	Placement tracker sheets	Employability		

Section No.	Record	Owner / holder	Retention	Reason
13.38	Surveys resulting from placements	Employability		
13.39	Details of any careers advice and support	Employability		

Alumni

Section No.	Record	Owner / holder	Retention	Reason
13.40	Details of alumni, correspondence and contacts in Raiser's Edge	Development and Alumni Relations Team	Permanently.	Fundamental business purposes

Version Control

Reference No.	Version	Executive Sponsor	Officer Responsible	Consultation Process	Effective Date
RMPds001	1	Chief Financial Officer	Head of Legal Services	GDPR Working Party	24 May 2018
RMPds001	1.1	Chief Operating Officer	General Counsel	Chief Operating Officer	1 February 2019
RMPds001	1.2	Chief Operating Officer	General Counsel	Information Security & Compliance Group	February 2021