



Data Archive Storage and Disposal Policy

The GDPR requires personal Data to be processed and stored in a manner that ensures its security. This includes protection against unauthorised access, unlawful processing and accidental loss. All documents and data must be stored and archived effectively so that they can be easily recalled on request. The Lynher Basement Archive Store is used to manage information that we have a lawful basis or legitimate need to keep for a specific purpose. It allows us to keep data secure and ensures that we only keep it for as long as we have a legal right to do so.

Information we keep must be relevant, up to date and easily accessible. The Archive Store must not be used for general storage of other materials, furniture, equipment or student work. In determining the basis for keeping the data a recorded judgment must be made about:

- Legal Basis for retaining the date
- Current and future value of the information
- Costs, risks and liabilities associated with retaining the information
- Ease or difficulty of making sure it remains accurate and up to date

A Team Member is designated for each area needing secure storage. They are responsible for the cataloguing, organising and confidential destruction of the data for their area, by the agreed date. A key holder is identified for each allocated storage pen to act as gatekeeper for the contents.

Any information stored in the Archive Store must be reduced to its most compact form (no binders, plastic sleeves, boxes or bags). It must be stored in boxes supplied by the Premises Team, designed to fit the installed racking. On the visible end, the box must be clearly marked with the following information:

- Designated Team and Cage Number
- Responsible Data Organiser
- Description of Contents
- Date Archived
- Destroy by Date.

When considering what you are entitled to store, the following questions help us to comply with the GDPR:

1. Do I have a lawful basis for retaining this information?
2. Are there legal or regulatory requirements for retaining this information?
3. Does the subject know what information we hold and understand how it will be used?
4. Is access to stored personal information strictly limited to those who need to know?
5. Is the stored personal information accurate and up to date?
6. Do I know when to destroy personal information as soon as I have no more need for it?
7. Are other team members aware of their duties and responsibilities under the GDPR?

Information must not be retained unless there is a legitimate and lawful basis for doing so, and must be securely destroyed if not.

All formal request for Data Subject Access must be forwarded to the SMT Data Protection Lead, in the first instance, using the College's Data Subject Access Request Form.

Retention of Personal Data (Staff and Students) – Archive Storage

Type of Data	Reason for Archiving	Indicative Retention Period
Student Records, including academic achievement and references	To provide personal and academic references Funding Body requirements	Maximum of 6 years with consent of the student
Student Records, including support and conduct records	Limitation period for negligence claims	Maximum of 7 years with consent of the student
Work Externally Moderated by the University of Plymouth	University Regulations	Maximum 5 years
Application forms and interview notes	Time limits on litigation Funding Body requirements	At least 30 months from the date of interview
Health Records	Management of the H&S at Work Regulations	During the period of enrolment or employment
Personnel Files including training records and notes of appraisals, disciplinary and grievance hearings	References Potential litigation	6 years from the last day of employment with the consent of the employee
Personnel health records where the reason for the termination of employment is connected with health, including stress related illness	Limitation period for personal injury claims	3 years from the last day of employment
Health Records kept by reason of COSHH Regulations	COSHH 2002	40 Years
Accident books and records of accidents	RIDDOR Regulations 2013	3 years from the date of last entry
Wages and Salary Records	Income Tax Act 2007	5 years
Income Tax and NI returns including correspondence with the Tax Office	Income Tax Act 2007	At least 3 years after the end of the financial year to which the records relate
Statutory Maternity Pay records	Maternity and Parental Leave Regulations 1999	At least 3 years after the end of the financial year to which the records relate
Statutory Sick Pay records	Statutory Sick Pay Regulations	At least 3 years after the end of the financial year to which the records relate
Facts relating to redundancy	Time Limits on Litigation where fewer than 20 redundancies	3 years from the date of redundancy
Facts relating to redundancy	Where fewer than 20 redundancies	Limitation Act 1980
ESF Paperwork and student records	Auditable Documents relating to ESF	7 years after the end of the programme. Current programme retention date is 31/12/30



TRURO AND PENWITH COLLEGE



Archive Storage Keepers

Cage Number	Team Area	Responsible Team Member	Key Holder (one only)
1	<ul style="list-style-type: none"> • Hair, Beauty and Catering • Community Studies • Sports • Professional Progression 	Hayley McKinstry Elizabeth Phillips Vicky Pearson Julian Roberts	Jose Mason
2	<ul style="list-style-type: none"> • MIS • ESF • Admissions • Attendance Records 	Mandy Godfrey Tracy Triggs	Mandy Godfrey
3	<ul style="list-style-type: none"> • Business Studies • Languages • Maths and Computing 	Sean Irwin Jen McConnell Colin Bacon	Bev Hunt
4	<ul style="list-style-type: none"> • Art and Design • Media and Photography • Performing Arts 	Mark Dunford Lee Clark Tracey Tickle	Hayley Tucker
5	<ul style="list-style-type: none"> • Learning Services • Student Services and Safeguarding • Computer Services 	Tamsin Merritt Emma Seward Adams Guy Guerandel	Susan Hanchett
6	<ul style="list-style-type: none"> • Business Team 	Adele Bull Tom Morran	Wendy Daniels
7	<ul style="list-style-type: none"> • Finance and Payroll 	Sue Dickinson Pam Arthur	Pam Arthur
8	<ul style="list-style-type: none"> • Higher Education • SCITT • Education 	Andrew Smart	Jina Prior
9	<ul style="list-style-type: none"> • Marketing and Publicity 	Matt Bond	Luke Laszczak
10	<ul style="list-style-type: none"> • Haven House 	Adele Bull	Wendy Daniels
11	<ul style="list-style-type: none"> • Principal and SMT • Health and Safety • Transport • Data Access and FoI 	Jane Cashmore	Julie Gilbert
12	<ul style="list-style-type: none"> • Exams 	Jennifer Hoare	Jennifer Hoare
13	<ul style="list-style-type: none"> • Humanities and Social Sciences • Science • Foundation Studies • Automotive, Engineering and Construction 	Euan Beattie Lowenna Bradley Theresa Edwards Nick Tillyer	Laura Hunkin