



Records Retention Policy

Policy Statement

Royal Holloway, University of London (the College) is committed to ensuring the processing of data relating to individuals is carried out in such a way as to limit the data processed in each instance to that which is necessary for the task and that personal data is processed for as long as necessary and no longer.

The retention periods for different groups of records shall be determined by consideration of the operational, legal and contractual requirements, and in line with best practice within the Higher Education sector. This will be informed by JISC's guidance.

Scope

This policy applies to all information, personal and non-personal, which is processed by the College in both electronic and physical record systems and should be followed by staff, students, and anyone associated with the College in an official capacity.

This policy articulates how the College determines the appropriate retention period for different groups of records, how staff are informed of these retention periods and how the College disposes of information.

This policy does not articulate the retention periods for groups of records and this is held in the Records Retention Schedule.

Operation of the Policy

The Data Protection Officer has overall responsibility for the Records Retention Schedule and ensuring it is maintained to reflect changes to regulatory or legislative requirements or best practice identified.

The Data Stewards inform the Records Retention Schedule as it pertains to the data for which they are accountable. Where there is regulatory or legislative guidance for their data, Data Stewards should adhere to that guidance. Where this guidance does not exist, Data Stewards may determine, in consultation with the Data Protection Officer and other business users, the retention period for data under their remit.

Variations to the retention period set out in the schedule must be discussed with the Data Protection Officer before they are enacted. Variations to the retention period requested by the Data Protection Officer in order to comply with legal actions will be communicated to the relevant Data Steward(s).

When the retention period expires, the data must be destroyed beyond the point of retrieval. Particular care must be given when this data is particularly sensitive or marked as Safeguarded or Controlled. A log which summarises the information which has been destroyed shall be kept and maintained by the Data Steward. A copy shall be made available to the Data Protection Officer upon request.

Where information shall be retained permanently and/or stored in the College's Archives, arrangements shall be made between the relevant Data Steward(s), Data Custodian(s) and the College Archivist for the secure completion of this process.

Further Information and Guidance

If anyone considers that this policy has not been followed they should raise the matter with the Data Protection Officer.

Further information on the interpretation and application of this policy may be obtained from dataprotection@rhul.ac.uk

Approved by:	PRC 16.05.18
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