



Document and Records Retention Policy

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1. Introduction

This document sets out City of Glasgow College's over-arching policy for the retention of personal data and its implementation strategy. This policy should be read in conjunction with the Document and Records Retention Procedure and outlines maximum retention periods applicable to the College's personal data.

The approaches set out in this policy are derived from the requirements of the UK GDPR.

In implementing this policy, there is an implicit expectation that Departments and Faculties have completed Registers of Processing Activity (ROPA) that set out the personal data collected across the entirety of business activities. The ROPA should also detail the basis for collecting/retaining the personal data; the systems and network drives on which the data is held; and the external parties with which the data is shared. Once established, the retention period and basis for retention of each type of personal data should also be recorded on the ROPA. Any defect in the integrity of a register will inhibit the ability to meet the requirements of this policy. If you are unsure whether your business area has and is maintaining a ROPA, please contact dpo@cityofglasgowcollege.ac.uk.

For the avoidance of doubt, this policy relates solely to personal data retention. Separate policies are maintained for the retention of other types of record (such as those relating to financial accounting, corporate taxation, and conduct risk management).

2. Purpose and Aims

This policy provides a consistent approach to retention and archiving of City of Glasgow College key business documents and records.

Note - All College documents or records will be retained in electronic form unless it is necessary to retain a hard copy.

3. Scope

The scope of City of Glasgow College documents covered is contained within the *Document and Records Retention Procedure*, see *Quality Management System*.

4. Policy Statement

The College will retain a document in line with the following 4 principles:

- We will only retain personal data where we have a lawful purpose for its retention;
- We will seek to delete personal data where we are satisfied that the lawful purpose has lapsed;

- Where we can identify criteria against which personal data may be systematically deleted, we will seek to apply automated processes to remove the data from our systems; and
- Where we require to retain documents after the lawful purpose has lapsed, we will seek to anonymise the data such that personal elements of the data are not readable.

All College documents or records will be retained in electronic form unless there is a statutory requirement to keep hard copies.

5. Responsibilities

Each Department and Faculty is responsible for ensuring that clear personal data retention criteria are set for all the personal data processed within their business activities. Department Directors and Faculty Deans are responsible for ensuring that retention periods are reviewed and updated as necessary. The retention periods and their justification should be documented on the ROPA.

Where a Department no longer has a lawful purpose to retain personal data, actions should be taken to delete it or remove those attributes from the data that enable its attribution to a living individual (Obfuscation).

Colleagues are required to delete and remove personal data held within email accounts, OneDrive and Microsoft Teams which the College no longer requires for business purposes.

Guidance in relation to data retention periods can be located in the Document and Record Retention Procedure and schedule. If you are unsure how or when to delete personal data from your own email, OneDrive and Microsoft Teams accounts after consulting the Record Retention Procedure and schedule contact the DPO at dpo@cityofglasgowcollege.ac.uk.

Departments and Faculties are responsible for determining whether to delete or obfuscate data, and for choosing the tools that they will deploy to ensure compliance with the principles set out above. Department Directors and Faculty Deans are responsible for ensuring that deletion or obfuscation is completed as necessary. You may seek advice from dpo@cityofglasgowcollege.ac.uk prior to deleting personal data.

6. Data Retention Implementation Strategy

The ICO recognises that the systematic deletion of data presents a significant challenge for organisations. Our current understanding is that the ICO will expect organisations to have clear plans as to how they will address the issue, and appropriate compensating controls to protect data from inappropriate access or loss, including the use of data encryption.

Unstructured data presents specific problems for the systematic deletion of data. All unstructured data should be kept in a central location so it can be easily located and disposed of at the end of the retention period.

The College does not recommend the use of OneDrive, SharePoint, and Teams to retain personal data for non-work related purposes, such as personal documents, photographs and other records that are not relevant to the business activities of the College.

7. Process for Handling Exceptions to this Policy

Exception to the policy must be formally agreed by City of Glasgow College's Data Protection Officer. Please contact dpo@cityofglasgowcollege.ac.uk.

8. References

8.1. Policy Framework

Associated Policies and Procedures	Title
Document Retention	Document and Record Retention Procedure

8.2. External References

Source	Title
Statute	Data Protection Act 2018
Statute	Freedom of Information (Scotland) 2002
UK GDPR (EU Regulation (Retained))	General Data Protection Regulation 2016/679

9. Document Control and Review

Approval Status	Approved
Approved by	Audit & Assurance Committee
Date Approved	June 2025
EQIA Status	EQIA Conducted? Yes: X No:
Proposed Review Date	September 2026
Lead Department	Data Protection Officer (DPO)
Lead Officer(s)	Depute Principal & COO
Board Committee	N/A
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10. Revision Log

Version Date	Section of Document	Description of Revision
Version 2 – 27 November 2023	All	Revision of whole document to comply with current regulations
Version 3 – May 2025	Section 5	Addition of responsibility of all staff to delete personal data from Email, OneDrive and MS Teams.