











## 6.2. Data Protection Act Compliance

Compliance with the 1998 Data Protection Act is the responsibility of all members of the College. Any deliberate breach of the data protection policy may lead to disciplinary action being taken, or access to College facilities being withdrawn, or even a criminal prosecution. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Data Protection Officer.

Personal information is any information related to an individual. This may be any individual the College has dealings with such as students, staff, governors etc.

All staff are responsible for ensuring that:

- Any personal data which they hold is kept securely.
- Personal information is not disclosed either orally or in writing or accidentally or otherwise to any unauthorised third party.

*Staff to note that unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.*

## 6.3. Responsibilities of Staff for their personal details

- To ensure any information that they provide to the College in connection with their employment is accurate and up to date.
- To inform the College of any changes to information, which they have provided i.e. changes of address.
- Checking the information that the College will send out from time to time, giving details of information kept and processed about staff.
- To inform the College of any errors or changes. The College cannot be held responsible for any errors that have not been notified in writing/email to HR.

## 6.4. Processing Sensitive Information

Sometimes it is necessary to process information about a person's health, criminal convictions, race and gender and family details. This may be to ensure the College is a safe place for everyone, or to operate other College policies. This information is considered sensitive, and it is recognised that the processing of it externally may cause particular concern or distress to individuals; staff and students will be asked to give express consent for the College to do this, although in cases where it is a legal requirement for the College to provide such information, it will do so. Offers of employment or course places may be withdrawn if an individual refuses to consent to internal information processing, without good reason. More information about this is available from the Data Controller.

## 6.5. The Data Controller

The College as a body corporate is the Data Controller under the Act. However, there is a designated Data Protection Officer that must be the first point of contact for all enquiries: (*management lead name*), Data Protection Officer, ILT Department.

## **7 Monitoring, Review and Evaluation**

The College will review the policy to take account of any new Government legislation, regulations or best practice documents, to ensure that staff are kept fully up to date with their responsibilities and duties with regard to this policy and procedures.

It is also recommended that the incidents are monitored by the seven strands of equality (i.e. gender, disability, race and ethnicity, age, LGBT - lesbian, gay, bisexual, transgender, religion and socio-economic) over a period of twelve months to identify any trends that need to be addressed.

## **8 Communication**

This policy is published on the College Staff intranet and made available to staff on request in a number of formats as required.

## 9 Equality & Diversity Impact Assessment Summary

|  | Age  | Disability  | Gender Reassignment                                   | Marital Status  | Pregnancy & Maternity   | Race   | Religion or Belief       | Sex                      | Sexual Orientation       |
|--|--|---|---|---|---|--|--------------------------|--------------------------|--------------------------|
| Which of the following protected characteristics may be affected by this policy or procedure?<br>(please mark the relevant box)  | <input type="checkbox"/>   | <input type="checkbox"/>                              | <input type="checkbox"/>                              | <input type="checkbox"/>                              | <input type="checkbox"/>  | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other concerns<br>(e.g. protected groups such as carers, young parents, women during pregnancy, young people living independently)   |  |   |   |   |   |  |                          |                          |                          |
| Does this policy impact on:<br>(please mark the relevant box)  | Staff<br><input checked="" type="checkbox"/>   | Students<br><input type="checkbox"/>                  | Parents or Carers<br><input type="checkbox"/>         | Members of the Public<br><input type="checkbox"/>     | External providers of services<br><input checked="" type="checkbox"/> |  |                          |                          |                          |
| Does your assessment show that this policy/procedure is affecting relations between different protected characteristics?<br>(please mark the relevant box)   | Y <input type="checkbox"/> N <input checked="" type="checkbox"/>   | Y <input type="checkbox"/> N <input type="checkbox"/> | Y <input type="checkbox"/> N <input type="checkbox"/> | Y <input type="checkbox"/> N <input type="checkbox"/> | Y <input type="checkbox"/> N <input type="checkbox"/>                 | Y <input type="checkbox"/> N <input checked="" type="checkbox"/> |                          |                          |                          |
| If yes, can the adverse impact be justified on the grounds of promoting equality of opportunity for one group, or as part of a wider strategy of positive action in relation to particular groups?<br>(please give reasonable justification) |  |   |   |   |   |  |                          |                          |                          |
| <b>Consultation</b><br>What steps have been taken to ensure that the different protected groups have been consulted during the development of this policy/procedure?   | <p>The policy was devised with relevance to AoC and JISC guidance. The following representative groups have been involved with the development and impact assessment of this policy:<br/>SLT</p> <p>The policy is also published to staff for an agreed period to ascertain further feedback before final placement on staff intranet.</p> |   |   |   |   |  |                          |                          |                          |
| <b>Staff Development and Training</b><br>Please list any staff development or training issues arising from this assessment.  | <p>CLT</p> <p>Curriculum Staff (data protection only)</p>  |   |   |   |   |  |                          |                          |                          |
| <b>Change/Modification</b><br>As a result of the Impact Assessment, have any changes/modifications to this policy/procedure been made?   | <p>Review Impact Assessment annually against data gathered on protected characteristic groups to determine if a particular group has been affected or other concerns have arisen.</p>  |   |   |   |   |  |                          |                          |                          |

## 10 Appendices

### Appendix 1 - Information Request Procedure

#### Background

The College will approach requests for information in a positive manner with a view to disclosing the requested information. However information does not have to be released in some situations, for example where release would contravene Data Protection law, endanger anyone's health and safety, breach confidentiality, or compromise commercial interests.

#### 1 Aims

To deal with all enquiries in relation to the Freedom of Information Act, Environmental Information Regulations or the Data Protection Act in a fair and consistent manner and in accordance with the requirements of the law.

#### 2 Reasons for the Procedure

To provide a first class level of customer service and comply with the requirements of the Freedom of Information Act 2000, Environmental Information Regulations 2014 and the Data Protection Act 1998.

#### 3 Objectives

To describe the formal procedure for dealing fairly and consistently with information requests.

#### 4 Response Time

All requests for information should be responded to within 20 working days following the date of receipt of the request. The information should be provided unless exemptions apply ([see Appendix 2](#)). The 20 working day period commences on the working day following the receipt of the written request. Working days exclude weekends and bank holidays, but include Principal's days.

#### 5 Information Requests

Requests for information do not need to mention the FoIA, the EIR or DPA but must:

- Be in writing (which includes email and fax);
- Give the applicant's name and return address; and
- Describe the information being sought.

The College may also send the applicant the College's '[Information Request Form](#)' which can be found on the College website. The College will charge for the provision of such information in all cases where it is legally entitled to do so.

There is no legal requirement for the applicant to provide reasons for why they require the information and how the information will be used. The applicant does not need to demonstrate that they have a good reason or a legitimate interest for seeking the information.

The College may also find they receive requests via the website 'whatdotheyknow.com' which helps applicants find out inside information about UK Government and UK public bodies.

Where it is reasonable to do so, the College may ask the applicant for further details of the request to enable them to identify and locate the information requested, e.g.

- Where the request is not in English;
- Where the request is not sufficiently precise for the College to be clear what information is sought; or
- Where a more focused request would assist the College in reducing the cost of compliance below the appropriate limit.

## **6 Procedure**

### **Step 1 - Receiving Requests (Responsibility: All staff)**

Information routinely provided to staff, students and the public should continue to be treated in accordance with normal procedures (this should not cover any information listed in the exempt categories in appendix 2). Any concerns about the information requested should be raised with the appropriate Line Manager in the first instance.

Requests for information must be made in a recorded format, e.g. email, letter, fax. The request must also provide the applicant's name and return address and describe the information being sought. Ideally, information requests should be submitted using the College's online '[Information Request Form](#)'.

A Word version of the form is also available on the following:

- College Website (under *Freedom of Information, Data Protection and EIR*)
- Staff under *Forms and Media / Forms*
- Student Intranet under *My College / Freedom of Information Act and My College | Data Protection Act*

### **Step 2 - Forwarding requests (Responsibility: All staff)**

Staff must not respond to Freedom of Information, Environmental Information or Data Protection information requests themselves. Requests for information that fall within these categories should be passed immediately to the ILT Department. The date the information request was received must be included in the notification. Staff must not respond to employment reference requests for staff/ex staff. All requests must be passed to Human Resources.

### **Step 3 - Logging Requests (Responsibility: Data Protection Officer)**

On receipt of a request for information under the FOI Act, the Data Protection Officer will log the date the request was received in the College, in order to comply with the 20 working day response requirement. The Data Protection Officer will acknowledge requests and maintain a register to monitor responses to ensure timescales are adhered to.

If the provision of the information is subject to a fee, the applicant will be advised accordingly and payment must be received prior to the information being provided. Under the FOI Act, the College is not required to comply with a request for information if the College estimates that the cost of complying would exceed the 'appropriate limit'. For the College, the current 'appropriate limit' is £450.

#### **Step 4 - Categorisation of Requests (Responsibility: Data Protection Officer)**

From the information request submitted by the requester, the category first needs to be established before it can be processed further. The categories are as follows:

- Freedom of Information request (information about the College).
- Environmental Information request (information about the College environment and controls).
- Data Protection request (personal information).

#### **Step 5 - Personal Identification (Responsibility: Data Protection Officer)**

If the information request falls within the Data Protection category, the requester must provide some form of personal identification. This may take one of the following forms:

- *Staff member:* College ID badge or email from individual College account.
- *Student Member:* College ID badge or email from individual College account.
- *Member of the public:* Photocopy of Driving Licence or Passport.

Details of the form of personal identification must be kept on file together with the information request.

#### **Step 6 - Initial Acknowledgement (Responsibility: Data Protection Officer)**

An initial response via email or letter should be sent to the information requester, stating that the information request has been received and is being processed.

At this stage it may be necessary to ask for further details from the requester in order to clarify the information required. In these instances, the 20 working day period for a request response will start on receipt of these further details, thus enabling the College to respond to the information requested.

Some requests may be for information included in the College Publication Scheme (see the College Website).

The initial response should be sent within **five** working days of the initial request.

#### **Step 7 - Issue of Response Pack to Request Processor (Responsibility: Data Protection Officer)**

The Data Protection Officer will send a copy of the request for information, the acknowledgment and also an Information Request Tracking form to the '**Request Processor**' (the member of staff nominated to process the request), clearly identifying timescales for reply. If any further information is required from the applicant, the Request Processor must advise the Data Protection Officer without delay.

The Request Processor selected will depend on the category of information request as follows:

- Freedom of Information request – Data Protection Officer.
- Environmental Information request – Assistant Director Infrastructure
- Management. Data Protection request of staff (past and present) – HR Department.
- Data Protection request of students (past and present) – Head of CIS.
- Other Data Protection requests from the public – Data Protection Officer.

## **Step 8 - Processing of Request (Responsibility: Request Processor) Exemptions**

For FoI or EIR requests the Request Processor must first establish whether or not any exemptions apply. The Request Processor should refer to [Appendix 2 Freedom of Information Guidelines and Principles](#) or [Appendix 3 Environmental Information Regulations Guidance](#). Alternatively the Request Processor should consult the ICO website (<https://ico.org.uk>) where guidance for FoI and EIR is published. Any exemptions should be clearly stated in the Information Request Tracking form.

### *Charges*

For FoI or EIR requests the Request Processor must ascertain the cost of processing a request. The guidelines for Fee Charges can be found under [Appendix 2 Freedom of Information Procedures and Principles section 4](#) and [Appendix 3 Environmental Information Regulations Guidance section 5](#).

Under the FoI Act, the College is not required to comply with a request for information if the College estimates that the cost of complying would exceed the 'appropriate limit'. For the College, the current 'appropriate limit' is £450.

Applicants must be notified of any costs as soon as possible and prior to the information being provided.

### *Finding the Information Requested*

The Request Processor must obtain the information requested (if available) and complete the Information Request Tracking form. Following this the form should be returned to the ILT Department. This must be done within the 20 working day time limit.

## **Step 9 - Information Request Response (Responsibility: Data Protection Officer)**

The Data Protection Officer must send a covering letter and:

- Provide the information requested, or
- Explain the reason why we have not been able to provide the information requested.

If a request for information falls within the list of absolute exemptions ([see Appendix 2](#)), the applicant should be informed in writing that the College is unable to release the information because an absolute exemption applies. It is not necessary to state whether the College does or does not hold the information.

A Public Interest Test will be conducted to determine whether the public interest is better served by withholding or releasing the exempt information. If the arguments in favour and against disclosure are equal, the College has a duty to disclose. If it is decided to withhold information because a qualified exemption applies, the College will:

- State whether it holds any information of the type requested. Explain why the exempt information has been withheld.
- Inform the applicant of their right to complain to the Information Commissioner at the following address:

Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

The FoIA allows the College to refuse to comply with a request for information that is vexatious or repeated.

## **7 If the Information Requester Complains**

If an Information Requester complains, they should be referred to the College's Customer Complaint's Procedure.

In response to complaints the College should ensure the following:

Complaints should be acknowledged promptly and the complainant should be given the College's target date for determining the complaint;

The review should be undertaken by someone more senior than the person who took the original decision;

The review should involve a full re-evaluation of the case;

Where the outcome of the review is that the information originally requested should now be disclosed, this should happen as soon as practicable and the applicant should be informed when this will be.

## **8 Monitoring**

The Data Protection Officer will monitor the progress of the Information Requests at all times. All communications and records pertaining to the Information Request must be kept on file.

The Data Protection Officer will provide an analysis of the number and nature of the requests and their outcome to Senior Management. Auditors may ask to see the log and the log will be provided to the Audit Committee on an annual basis.

## Appendix 2 - Freedom of Information Guidelines and Principles

### 1 General Compliance Principles

The College must comply with a request promptly and in any event will have 20 working days to respond. The 20 working day period starts on the working day after the day on which the College receives the request (for example, if the College receives a request on a Friday, time starts running on the following Monday). Working days exclude weekends and bank holidays but include days when the College is closed but which are neither weekends nor bank holidays.

Where the College reasonably asks for further details to enable it to comply with the request, the 20 working day period does not start running until they receive those details. The College must not delay in requesting further details simply to give more time to respond to the applicant's request.

If the College requires the applicant to pay a fee (see section 4), the 20 working day period stops on the working day before the day on which the College sends a fee notice to the applicant and re-starts the working day after the College receives the fee.

If one of the qualified exemptions applies to the information requested and the College has to apply the public interest test (see section 8), it may extend the 20 working day period for a reasonable time in order to consider the public interest test. The College must notify the applicant of the estimated date for response.

Under the FoIA there is a duty to advise and assist those making a request. This means that the College should try and be as helpful as possible when responding to a request. For example, if someone makes a request in the wrong way it would be expected that College gives the individual information on how to make an appropriate request rather than ignoring the request because of the error.

The College is under a statutory duty to provide advice and assistance to applicants. The College should, amongst other things:

- Publish its procedures for dealing with freedom of information requests, including an address and telephone number for information and assistance;
- Ensure that appropriate assistance is given to enable an applicant to make a request in writing where the applicant is unable or has difficulty to do so;
- Provide assistance to the applicant to enable them to describe more clearly the information requested;
- Consider whether any suitable information is available free of charge if the applicant is not prepared to pay the requested fee; and
- Where the cost of complying with the request would exceed the appropriate limit, consider what, if any, information could be provided within the cost ceiling.

## 2 Refusing to Deal with a Request

The FoIA allows the College to refuse to comply with a request for information that contravenes the Data Protection Act or is vexatious or repeated.

DPA Infringement - The exemption clauses within the Data Protection Act state that FoIA requests for personal data referring to an individual or individuals should be refused. This includes situations where individual personal information can be derived from the information requested. FoIA requests of this nature should be referred to the College Data Protection Officer in the first instance before formal notification of refusal.

A request is vexatious if a reasonable person would conclude that the effect of the request would be disproportionate or cause inconvenience or expense to the College and that the request:

- Clearly does not have any serious purpose or value; Is designed to cause disruption or annoyance;
- Has the effect of harassing the College; or
- Can otherwise fairly be characterised as obsessive or manifestly unreasonable.

Colleges must consider the nature of the request, not the nature of the requester (applicant). Factors which may suggest that requests are vexatious include:

- The declared intention of the applicant or College's knowledge of the applicant's intentions (e.g. where the College knows that there is an orchestrated campaign to cause the College inconvenience);
- The request clearly has no serious purpose or value (this will often arise where there has been a series of requests);
- The effect of legitimate editing of the information (e.g. the deletion of confidential materials) would render the information worthless; or
- The information requested is clearly exempt.

Requests from the same applicant that are identical or substantially similar may be deemed repeated requests.

In some cases, identical or substantially similar requests may not be repeated, e.g.

- A reasonable interval has elapsed between them;
- The applicant is different;
- The information to be disclosed has changed in the intervening period.

It is possible that many different individuals will make identical or substantially similar requests. If the College is, or becomes, aware that individuals are acting as part of a group seeking to make vexatious or repeated requests, the College is entitled to refuse the requests.

If the College considers that a request is vexatious or is a repeated request, they must notify the applicant and inform them of why the College considers the request to be vexatious or repeated.

The College must also make the applicant aware of the [College's Customer Complaints Procedure](#) (see section 9).

## 3 Holding Information

The College only needs to deal with requests where it holds the information or has it available to it. This section sets out the basic concepts as to what information is regarded as being held by a public authority for the purposes of the FoIA. It is not a simple case that everything the College has is subject to the FoIA.

The FoIA applies to information which the College possesses. This captures:

- Information which the College holds;
- Information which belongs to the College, but has been passed to another public authority, and
- Information which belongs to the College but is held by another party on the College's behalf (e.g. information held by College solicitors or accountants).

The College may hold information on behalf of somebody else. This information may not be covered by the FoIA. A distinction is drawn between the origin of information and whether it is held on behalf of another. Where the College effectively controls the information and holds it in its own right, for its own purposes, the information is unlikely to be held on behalf of another.

Different considerations apply depending on whether the information is held on behalf of another public authority or a private body.

Where an applicant asks the College for such information, the College is not obliged to provide it because it is the other public authority that holds the information under the FoIA. However, the College is under a duty to advise and assist the applicant.

There are various options in dealing with this situation:

- Ask the applicant to re-direct the request to the originating public authority; or Transfer the request to the other public authority; or
- Deal with the request but consult with the other public authority as it is their responsibility to make the disclosure decision.

The College may hold some information on behalf of private individuals or companies in the private sector. This information is not covered by the FoIA. However, in most cases, private sector information held by the College will be for College's own purposes and therefore it will be covered by the FoIA.

There may be cases where it is unclear whether private information would be subject to the FoIA. A good example is tender documentation used for the procurement of services. The documentation provided by the competing companies belongs to the individual companies; however this information has been produced for a College purpose of determining who should carry out the work.

Even in cases where the College does not hold information for the purpose of the FoIA, it will still need to reply to the applicant. While the College will not be under any duty to provide the information, it is still required to provide advice and assistance.

#### **4 Fees and Charges**

Under the FoIA the College is not required to comply with a request for information if it is estimated that the cost of complying would exceed the appropriate limit. For Colleges (and all public authorities other than central Government departments), the current appropriate limit is £450 as laid out in The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004

The appropriate limit has to be applied separately to each request; the duty to confirm or deny and the duty to disclose information pursuant to a request.

The ICO guide on charging a fee provides further information.

In estimating whether the cost of complying with a request for information is likely to exceed £450, the College can only take account of the costs it *reasonably* expects to incur in:

- Determining whether it holds the information requested;
- Locating the information;
- Retrieving the information; and
- Extracting the information from a document containing it or from archives.

The College must use a figure of £25 per person per hour in estimating the cost of the labour involved in any of these four activities, regardless of the actual cost. The labour can be either the College's own staff or independent contractors engaged by the College to assist with handling the requests for information.

The College should consider whether it will take longer than 18 hours to carry out the above activities.

For these purposes, the College cannot consider the costs (including labour costs) of:

- Giving general advice and assistance to the applicant;
- Considering whether further details are required from the applicant;
- Considering whether the request is vexatious or repeated;
- Calculating any fees to be charged;
- Consulting with third parties; or
- Considering whether any exemptions apply, including any legal costs incurred in deciding whether any exemptions apply.

Where the estimated cost of complying with a request is less than £450, the College can charge for costs that it reasonably expects to incur in informing the applicant whether the College holds the information and communicating the information to the applicant, including post, copying and if necessary, converting the information into the format requested by the applicant. The College **cannot** charge for the labour involved.

Costs have to be reasonable. For example, photocopying is expected to cost no more than 10p per sheet.

Where the cost of complying is very low (less than £10), Colleges are encouraged to waive the fee altogether.

Further information is available in the ICO guidance document '[Fees that may be charged when the cost of compliance does not exceed the appropriate limit](#)'.

The College is not required to comply with a request for information where the estimated cost of doing so would exceed £450. However, the College still has a duty to confirm or deny whether it holds the information, unless the cost of even doing this would exceed £450.

Colleges will be under a continuing duty to provide the applicant with advice and assistance.

Therefore, the College should consider whether:

- It is prepared to comply with the request, even though the estimated cost would exceed £450; or
- There is other information that the College could provide at a lower cost or free of charge; or Whether the information is available elsewhere.

If the College does not wish to comply with a request where the cost of complying would exceed £450, it must notify the applicant that the estimated cost of complying with the request is above £450 and make the applicant aware of the [College's Customer Complaints Procedure](#).

Further information is available in the ICO guidance document 'Fees that may be charged when the cost of compliance exceeds the appropriate limit'.

In calculating the fee, the College must disregard the costs of considering whether any exemptions apply and cannot charge one applicant for the total cost of complying with aggregated requests received from a number of applicants.

The College can aggregate the estimated costs of complying with a request for information, for the purposes of assessing whether the £450 limit is exceeded, where the College receives two or more requests for information which:

- Are from the same person or from different persons who appear to Colleges to be acting in concert or in pursuance of a campaign; and
- Relate to the same or similar information; and
- Have been received by the College within a space of 60 consecutive working days.

As a matter of good practice, the College should exercise extreme caution when deciding whether requests should be aggregated. The College should only aggregate the core requests where there are strong grounds for believing that they have been framed precisely in order to circumvent the £450 limit.

The College should note the following quirk when charging fees:

- If the information requested is held by a public authority, the fees charged would not be subject to VAT.
- If the information requested is available from another source that is not a public authority, the fees charged would be subject to VAT.
- Fees charged for information that is provided in accordance with a public authority's publication scheme will attract VAT.

Further information is available on the Ministry of Justice website.

## **5 Exemptions**

The exemptions are split into two categories – absolute exemptions and qualified exemptions.

The College has two duties:

- To confirm or deny whether it holds the information; and
- To provide the information.

The exemptions must be used separately in relation to each duty. The exemptions are worded by reference to whether the requested information may not be disclosed. Care must be taken to assess whether the duty to confirm or deny arises.

A list of exemptions can be found at <http://www.legislation.gov.uk/ukpga/2000/36/contents>  
The refusal notices must also be accompanied by information making the applicant aware of the [College's Customer Complaints Procedure](#).

## 6 Absolute Exemptions

Where the College is seeking to rely on an absolute exemption, it is also generally the case that the duty to confirm or deny will also be exempt. However, this does not always have the same effect for all the absolute exemptions. This is highlighted for each exemption in the following pages. The duty to confirm or deny must always be considered separately.

Set out below are the absolute exemptions which are likely to be applicable to Colleges. Colleges considering applying other absolute exemption(s) should seek legal advice.

- Information accessible to the applicant by other means - Section 21 of the FoIA Court Records - Section 32 of the FoIA
- Personal Information - Section 40 of the FoIA
- Information provided in confidence - Section 41 of the FoIA Prohibitions on disclosure - Section 44 of the FoIA

## 7 Qualified Exemptions

The exemptions are split into two categories – absolute exemptions and qualified exemptions. This section looks at qualified exemptions and how these operate.

A qualified exemption means that there are two tests to be applied:

- Whether the exemption applies;
- Whether the public interest test in disclosing the information outweighs the public interest in not disclosing (the public interest test).

The term public interest is not defined in the FoIA. However, it is clear that something that is in the public interest is something which serves the interest of the public *not* something which is merely of interest to the public. In applying this test, the College should decide whether in any particular case it serves the interests of the public better to withhold or to disclose information.

The FoIA requires Colleges to disclose information unless there is a good reason not to. The exemption can only be maintained (upheld) if the public interest in doing so outweighs the public interest in disclosure.

There is a general presumption that it is in the public interest to disclose information but this must be balanced against the need to facilitate effective government and public administration. Therefore, there may be particular public interest considerations in favour of refusing the request. In effect, the qualified exemptions provide the public interest considerations for withholding information.

In applying the public interest test, the College will have to balance two competing public interests: the public interest in disclosing the information and the public interest in maintaining the relevant exemption and withholding the information.

When making its determination, the College **should not** give weight to:

- The private interest of Colleges in withholding information because the information would reveal incompetence or cause embarrassment; or
- The fact that the information is complicated or incomplete. In these circumstances, Colleges may explain or give the context for the requested information.

| Factors favouring disclosure   | Factors against disclosure  |
|--|---|
| <p>Disclosure would:</p> <ul style="list-style-type: none"> <li>- Further understanding and debate of current issues especially issues in the media.</li> <li>- Promote accountability and transparency in the spending of public money.</li> <li>- Promote understanding of decisions taken by Colleges and how to challenge them.</li> </ul> | <p>The factors are set out in the exemptions. For example, it is in the public interest to protect:</p> <ul style="list-style-type: none"> <li>- Law enforcement.</li> <li>- Investigations and proceedings.</li> <li>- Legal professional privilege.</li> </ul> <p>In some cases disclosing information will hinder effective government where:</p> <ul style="list-style-type: none"> <li>- Information is disclosed prior to its proposed publication date.</li> <li>- Information is disclosed which will inhibit proper discussion.</li> </ul> <p>In other cases disclosure will make it difficult to ensure that effective government occurs if:</p> <ul style="list-style-type: none"> <li>- Commercially sensitive information is released.</li> <li>- Trade secrets are revealed.</li> </ul> |

The College must make sure that it makes it clear in the refusal notice that it has applied the public interest test in respect of each duty.

## 8 Main Qualified Exemptions for Colleges

Set out in the following section are details of the main exemptions which are likely to be useful for Colleges:

- Information intended for future publication - Section 22 of FoIA
- Prejudice to effective conduct of public affairs - Section 36 of FoIA Legal professional privilege - Section 42 of FoIA
- Commercial Interests - Section 43 of FoIA

Information intended for future publication - This exemption allows public authorities to refuse a request where the information is intended for future publication. The decision to publish must have been taken before the request is received, although, a definite date for the future publication need not have been set. The exemption is subject to the public interest test and so the College must decide whether it is in the public interest to disclose the information early.

Prejudice to effective conduct of public affairs – This exemption allows the designated person to determine in his reasonable opinion whether disclosure of the information would have one or more of the following effects:

- Would or would be likely to inhibit the free and frank provision of advice; or
- Would or would be likely to inhibit free and frank exchange of views for the purpose of deliberation; or
- Would otherwise prejudice or be likely otherwise to prejudice, the effective conduct of public affairs.

In exercising their reasonable opinion the Principal must be objective and make their decision based on evidence. Their opinion must be within the range of reasonable opinions and should not be based on irrelevant material or without consideration of all the relevant facts.

If the Principal believes that disclosure of the information would prejudice the aspects outlined above, then the public interest test must also be applied.

## **9 Complaints Procedure**

The College is required to have a procedure for dealing with complaints both in respect of its handling of requests for information and in respect of its publication scheme. The complaints procedure should allow for a fair and thorough review of the way in which colleges handle requests for information and of decisions taken by colleges pursuant to the FoIA, including decisions relating to the application of exemptions and the public interest test.

In response to complaints the College should ensure the following:

- Complaints should be acknowledged promptly and the complainant should be given the
- College's target date for determining the complaint;
- The review should be undertaken by someone more senior than the person who took the original decision;
- The review should involve a full re-evaluation of the case;
- Where the outcome of the review is that the information originally requested should now be disclosed, this should happen as soon as practicable and the applicant should be informed when this will be.

Wherever the College serves a refusal notice on an applicant, it must also make the applicant aware of the [College's Customer Complaints Procedure](#) setting out details of:

- The College's complaints procedure; and
- The applicant's right to complain to the Information Commissioner.

Although not strictly required by the FoIA good practice would also be to make the applicant aware of the [College's Customer Complaints Procedure](#) whenever, having received further details of the information requested, Colleges still feel that they do not have sufficient details to identify or collate the information requested.

## **Appendix 3 - Environmental Information Regulations Guidance**

### **1 Main Principles**

The Regulations give people a right of access to information about the activities of the College that relate to or affect the environment, unless there is good reason for them not to have the information.

This means that everyone has a right to access environmental information. Disclosure of information should be the default – in other words, information should be kept private only when there is a good reason and the Regulations allow it.

An applicant (requester) does not need to give a reason for wanting the information. All requests for information must be treated equally.

The Environmental Information Regulations do not prevent you voluntarily giving information to people outside the provisions of the Regulations.

### **2 Information Covered**

The Regulations cover any recorded information the College holds that falls within the definition of 'environmental information'. It is not limited to official documents or information created by the College. It can cover, for example, drafts, emails, notes, recordings of telephone conversations and CCTV recordings.

Unlike the Freedom of Information Act, the Regulations do not explicitly exclude information that you hold solely on behalf of another person or body. The Regulations say that any information that is in your possession that you have produced or received is considered to be 'held'.

The College only has to respond to an Environmental Information request if it already has the information in recorded form. The College does not have to create new information or find out the answer to a question.

The Environmental Information Regulations do not provide a right of access to a person's own information. If someone makes a request for their own personal information, this should be dealt with under the Data Protection Act.

### **3 Exemptions and Request Refusals**

A request for information can be refused if:

- The information is not held.
- The request is manifestly unreasonable such as vexatious requests.
- The request is too general (after fulfilling the duty to advise and assist).
- The request is for unfinished documents or data (in which case an estimated time for completion should be given).

- It is not in the public interest to release the requested information (following a Public Interest test).

Information may also be withheld to protect the following:

- Confidentiality of proceedings.
- International relations / public security / defence. The course of justice and fair trial.
- Commercial confidentiality. Intellectual property rights. Personal Information.
- Data supplied voluntarily. Environmental protection.

#### **4 Publication Scheme**

One of the College's obligations under the Environmental Information Regulations is to publish environmental information proactively. The Regulations require you to do this in the following two ways:

- The College should publish information by easily accessible electronic means.
- The College should organise its records in such a way that it can publish certain information routinely.

These obligations are separate from the College's duty to make information available in response to individual requests.

The College does not have to publish all the environmental information it holds. The minimum the College should routinely publish to comply with its obligations under the Regulations is listed in Article 7(2) of the European Directive 2003/4/EC. It includes things like policies, plans and procedures relating to the environment, reports on the state of the environment, and environmental impact studies. It also includes data taken from monitoring activities and risk assessments that affect or are likely to affect the environment.

#### **5 Charges and Fees**

There are two broad types of costs for which a public authority can charge:

- The cost of staff time spent locating, retrieving and extracting the information.
- The costs incurred when printing or copying the requested information and sending it to the requester.

For staff time, the standard rate per hour is set at £25. This is in line with current ICO recommendations.

## **Appendix 4 - Data Protection Procedures & Guidelines**

### **1 Updating and Processing of Data**

#### **1.1 Regular Updating**

The College will update staff data at least annually. Students' data is updated annually through the enrolment process.

If and when, as part of their responsibilities, staff collect information about other people, (e.g. about students' course work, opinions about ability, references to other academic institutions, or details of personal circumstances), they must comply with the guidelines for staff.

#### **1.2 Processing Sensitive Information**

Sometimes it is necessary to process information about a person's health, criminal convictions, race and gender and family details. This may be to ensure the College is a safe place for everyone, or to operate other College policies, such as the sick pay policy or equal opportunities policy. Because this information is considered sensitive, and it is recognised that the processing of it may cause particular concern or distress to individuals, staff and students will be asked to give express consent for the College to do this. Offers of employment or course places may be withdrawn if an individual refuses to consent to this, without good reason. More information about this is available from the Data Controller.

### **2 Data Security**

All staff are responsible for ensuring that:

- Any personal data which they hold is kept securely.
- Personal information is not disclosed either orally or in writing or accidentally or otherwise to any unauthorised third party.

Staff should note that unauthorised disclosure will usually be a disciplinary matter, and may be considered gross misconduct in some cases.

Personal information should be:

- Kept in a locked filing cabinet; or In a locked drawer; or
- In a locked room, or if it is electronic (computerised), be password protected and also encrypted if saved to a portable device.

### 3 External Data Transfer

Where personal data is being transferred to an external organisation the following must be adhered to:

- The external organisation and type of data transfer must be on the External Data Transfer Register.
- Where there is no established record on the External Data Transfer Register, the Data Protection Officer should be contacted with a request for data transfer. The Data Protection Officer will then determine whether or not the request is to be approved and subsequently included on the External Data transfer register.
- Electronic data must always be encrypted and password protected before being transferred. Paper based personal records must be sent via recorded delivery or via courier.

#### Student Obligations

Students must ensure that all personal data provided to the College is accurate and up to date. They must ensure that changes of address, etc. are notified to the Student Support department or other person as appropriate.

### 4 Rights to Access Information

#### 5.1 Information Access in Order to Fulfil Job Role

Staff will only be given access to student and/or staff information held by the College if they require this information in order to fulfil their job role. For specific cases, members of the Senior Leadership Team may request that special access be granted to a member of staff. This request should be made to the Data Protection Officer who will ultimately approve or reject the request.

The IT department is responsible for administering access to electronic file areas. Access to core applications such as Finance, are the responsibility of the department administrators given control of the application concerned.

#### 5.2 Information Access in order for Individuals to View Data Kept about Them

Staff, students and other users of the College have the right to access any personal data that is being kept about them either on computer or in certain files. Ideally, any person who wishes to exercise this right should complete the College's online '[Information Request form](#)'.

A Word version of the form is also available on the following:

- College Website under the *Freedom of Information, Data Protection and EIR*
- Staff Intranet under *Forms and Media / Forms*
- Student Intranet under *My College / Freedom of Information Act and My College | Data Protection Act*

The completed form should then be sent via email to [foi@wlc.ac.uk](mailto:foi@wlc.ac.uk) or sent to the following address:

Freedom of Information  
Ealing, Hammersmith & West London College  
Gliddon Road  
London  
W14 9BL

The College will make no charge for the first occasion that access is requested, but may make a charge of £10 per each subsequent request at its discretion.

The College aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 20 working days unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the data subject making the request.

## **5 Processing of Personal Data**

In many cases, the College can only process personal data with the consent of the individual. In some cases, if the data is sensitive, **express consent** must be obtained. Agreement to the College processing some specified classes of personal data is a condition of acceptance of a student onto any course, and a condition of employment for staff. This includes information about previous criminal convictions.

Some jobs or courses will bring the applicants into contact with children, including young people between the ages of 16 and 18. The College has a duty under the Children Act and other enactments to ensure that staff are suitable for the job, and students for the courses offered. The College also has a duty of care to all staff and students and must therefore make sure that employees and those who use the College facilities do not pose a threat or danger to other users.

The College will also ask for information about particular health needs, such as allergies to particular forms of medication, or any conditions such as asthma or diabetes. The College will only use the information in the protection of the health and safety of the individual, but will need consent to process in the event of a medical emergency, for example.

## **6 Examination Marks**

Students will be entitled to information about their marks for both coursework and examinations. However, this may take longer than other information to provide. The College may withhold certificates, accreditation or references in the event that the full course fees have not been paid, or all books and equipment returned to the College.

## **7 Retention of Data**

The College will keep some forms of information for longer than others. Because of data retention legislation, information about students will not be kept indefinitely, unless there are specific requests to do so. A list is attached of the archiving guidelines and retention time spans employed by the College ([see appendix 5](#)).

## **8 Disposal of Data**

When personal data is no longer required, or has passed its retention date, paper records must be shredded. If there is a significant amount of material which cannot be dealt with by normal shredding machines, the Estates department helpdesk should be contacted for a secure shredding bag which can be topped up and shredded by the College's agreed third party.

Computerised records must be permanently deleted, with particular care taken that 'hidden' data cannot be recovered. The ILT Helpdesk can advise on permanent deletion of computerised records. Where old or broken computer equipment is being sent for scrap, all associated media devices must be cleaned of all data using the permanent deletion method as agreed by the ILT department.

## 9 Archiving

Where staff have identified records that require archiving these must be boxed, tagged and recorded using the following process:

- Records must be boxed in the designated archive boxes. For clarification contact the Estates Management department.
- Boxes should not be over-packed.
- A list of the box contents should be retained by the department. An Archiving Record Book / Database must be kept in each department, and contain the following information:
  - Box Number (bar code sticker provided by the Estates Management department).
  - Box Description.
  - Name of College / Department.
  - Archive Date.
  - Destruction Date.
  - List of Contents (created during packing stage).
- A duplicate list of contents must be secured to the inside of the lid of the box once packed. When the boxes are ready to be sent to archive, a request for collection should be raised on the Facilities Helpdesk.

Following this process will ensure the College / Department know what records have been archived, for retrieval and audit purposes. All staff must be aware of the book / database and where it is stored. Electronic databases should be stored on network drives for backup and recovery purposes.

To request the retrieval of records from the archive staff should log a request on the Estates Helpdesk with:

- Name of College / Department (as recorded on box)
- Box Number
- Delivery address

Boxes will be delivered by the Estates department.

Each year the Estates Department will check the archive in the August holiday period. Any boxes with the destruction date within the previous year will be disposed of. An inventory of those boxes sent for destruction will be taken and sent to the relevant Programme Area/Department to allow the withdrawal of these items from locally held records.

## 10 Responsibilities – Nominated Persons

Compliance with the 1998 Act is the responsibility of all members of the College. Any deliberate breach of the data protection policy may lead to disciplinary action being taken, or access to College facilities being withdrawn, or even a criminal prosecution. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Data Protection Officer.

### 11.1 Responsibilities of Staff

- To check that any information that they provide to the College in connection with their employment is accurate and up to date.
- To inform the College of any changes to information, which they have provided i.e. changes of address.
- To check the information that the College will send out from time to time, giving details of information kept and processed about staff.

- To inform the College of any errors or changes. The College cannot be held responsible for any errors that have not been notified.

## **11.2 The Data Controller**

The College as a body corporate is the Data Controller under the Act, and the Senior Leadership Team is therefore ultimately responsible for implementation. However, there is a designated Data Protection Officer that deals with data protection issues and requests. The first point of contact for enquiries is:

*Urmila Rasan - Executive Director Finance & Shared Services*

## **11 Authorised staff**

The College will designate staff as 'authorised staff'. These are the only staff authorised to hold or process data that is:

- Not standard data; or
- Sensitive data

The only exception to this will be if a non-authorized staff member is satisfied that the processing of the data is necessary:

- In the best interests of the student or staff member, or a third person, or the College; AND
- He or she has either informed the authorised person of this, or has been unable to do so and processing is urgent and necessary in all the circumstances.

This should only happen in very limited circumstances. Example: a student is injured and unconscious, but in need of medical attention, and a staff tutor tells the hospital that the student is pregnant or a Jehovah's Witness.

Authorised staff will be responsible for ensuring that all data is kept securely.

Staff must not disclose personal data to any student, unless for normal academic or pastoral purposes, without authorisation or agreement from the data protection officer, or in line with the College policy.

Staff shall not disclose personal data to any other staff member except with the authorisation or agreement of the designated data controller, or in line with College policy.

## 12 Staff Checklist for Recording Data

Before processing any personal data, all staff should consider the checklist:

- Do you really need to record the information?
- Is the information 'standard' or is it 'sensitive'?
- If it is sensitive, do you have the data subject's express consent?
- Has the student or the staff member been told that this type of data will be processed? Are you authorised to collect/store/process the data?
- If yes, have you checked with the data subject that the data is accurate? Are you sure that the data is secure?
- If you do not have the data subject's consent to process, are you satisfied it is in the best interests of the student or the staff member to collect and retain the data?
- Have you reported the fact of data collection to the authorised person?

## Appendix 5 - Data Retention Plan

| Responsibility | Class No.                               | Description  | Retention Period                     |
|----------------|---|--|--------------------------------------|
| Finance        | 2.3 Financial and Management Accounting | Records documenting the payment and/or reimbursement of employees' expenses.                                     | Current financial year + 6 years     |
| Finance        | 2.3 Financial and Management Accounting | Records documenting the payment of expenses to third parties (e.g. honorary appointees).                         | Current financial year + 6 years     |
| Finance        | 2.3 Financial and Management Accounting | Records documenting the handling of petty cash.  | Current financial year + 6 years     |
| Finance        | 2.3 Financial and Management Accounting | Records documenting the receipt and processing of students' fees.  | Current financial year + 6 years     |
| Finance        | 2.6 Payroll and Pensions                | Records documenting employees' authorisation for non-statutory payroll deductions.                               | Current tax year + 6 years           |
| Finance        | 2.6 Payroll and Pensions                | Records documenting calculation and payment of payroll payments to employees.                                    | Current tax year + 3 years           |
| Finance        | 2.6 Payroll and Pensions                | Records documenting the operation of the Statutory Sick Pay scheme.  | Current tax year + 3 years           |
| Finance        | 2.6 Payroll and Pensions                | Records documenting the operation of the Statutory Maternity Pay scheme.   | Current tax year + 3 years           |
| Finance        | 2.6 Payroll and Pensions                | Records documenting payments of the institution's employers' contributions to pension schemes for its employees. | Termination of employment + 75 years |
| Finance        | 2.6 Payroll and Pensions                | Records documenting payments of the institution's employees' contributions to pension schemes.                   | Termination of employment + 75 years |
| Finance        | 2.7 Cash, Investments and Assets        | Records documenting the opening, closure and routine administration of bank accounts.                            | Closure of account + 6 years         |

| <b>Responsibility</b> | <b>Class No.</b>                 | <b>Description</b>  | <b>Retention Period</b>   |
|-----------------------|----------------------------------|---|---|
| Finance               | 2.7 Cash, Investments and Assets | Records documenting routine bank account deposits / withdrawals / transfers (paying-in slips, transfer instructions, bank statements etc.).                                       | Current financial year + 6 years  |
| Finance               | 2.8 Procurement                  | Records documenting supplier evaluation criteria.   | Superseded + 5 years  |
| Finance               | 2.8 Procurement                  | Records documenting invitations to prospective suppliers to apply for approval.   | Expiry of invitation OR Rejection of application + 6 months OR Completion of approval |
| Finance               | 2.8 Procurement                  | Records documenting the evaluation of applications for approval from prospective suppliers, and notification of the outcome: approved suppliers.                                  | Termination of approval   |
| Finance               | 2.8 Procurement                  | Records documenting the evaluation of applications for approval from prospective suppliers, and notification of the outcome: rejected suppliers.                                  | Rejection + 1 year  |
| Finance               | 2.8 Procurement                  | Records documenting the process of inviting and evaluating pre-qualification submissions from prospective suppliers.  | Award of supply contract + 1 year   |
| Finance               | 2.8 Procurement                  | Records documenting Invitations to Tender and tender evaluation criteria.   | Termination of supply contract awarded + 6 years                                      |
| Finance               | 2.8 Procurement                  | Records documenting the issue of Invitations to Tender and handling of incoming tenders.  | Award of supply contract + 1 year   |
| Finance               | 2.8 Procurement                  | Records documenting the evaluation of tenders, the conduct of negotiations with tenderers and the notification of the results of the tender evaluation process: rejected tenders. | Award of supply contract + 1 year   |

| <b>Responsibility</b> | <b>Class No.</b>                          | <b>Description</b>  | <b>Retention Period</b>                          |
|-----------------------|---|---|--|
| Finance               | 2.8 Procurement                           | Records documenting the evaluation of tenders, the conduct of negotiations with tenderers and the notification of the results of the tender evaluation process: accepted tenders. | Termination of supply contract awarded + 6 years |
| Finance               | 2.8 Procurement                           | Contract award report (as required by the Regulations cited).   | Termination of supply contract awarded + 6 years |
| Finance               | 2.8 Procurement                           | Statistical reports to HM Treasury on contracts awarded (as required by the regulations cited).   | Current year + 3 years                           |
| Finance               | 2.8 Procurement                           | Records documenting variations to contracts (e.g. revisions, extensions).   | Termination of contract + 6 years                |
| Finance               | 2.8 Procurement                           | Records documenting the monitoring of supplier performance and action taken regarding under-performance.  | Termination of contract + 6 years                |
| Human Resources       | 3.1 Human Resources Strategy and Planning | Records containing data on and analyses of, performance against the plans for the implementation of the institution's personnel strategy.   | Current year + 1 year                            |
| Human Resources       | 3.1 Human Resources Strategy and Planning | Records containing reports of performance against the plans for the implementation of the institution's personnel strategy.   | Current year + 10 years                          |
| Human Resources       | 3.1 Human Resources Strategy and Planning | Records documenting the conduct and results of audits and reviews of the personnel management function, and responses to the results.   | Current year + 10 years                          |
| Human Resources       | 3.1 Human Resources Strategy and Planning | Records documenting the assessment and analysis of workforce requirements, and the identification and evaluation of options for meeting these requirements.                       | Current year + 3 years                           |
| Human Resources       | 3.1 Human Resources Strategy and Planning | Records documenting management succession plans.  | Superseded + 5 years                             |
| Human Resources       | 3.1 Human Resources Strategy and Planning | Records documenting the development and evaluation of job specifications.   | Superseded + 5 years                             |

| <b>Responsibility</b> | <b>Class No.</b>                        | <b>Description</b>  | <b>Retention Period</b>              |
|-----------------------|---|---|--------------------------------------|
| Human Resources       | 3.2 Recruitment                         | Records documenting internal authorisation for recruitment.   | Current year + 1 year                |
| Human Resources       | 3.2 Recruitment                         | Records documenting enquiries about vacancies and requests for application forms.   | Completion of appointment            |
| Human Resources       | 3.2 Recruitment                         | Records documenting the handling of applications for vacancies: unsuccessful applications.  | Completion of appointment + 6 months |
| Human Resources       | 3.2 Recruitment                         | Records documenting the handling of applications for vacancies: successful applications.  | Termination of employment + 6 years  |
| Human Resources       | 3.2 Recruitment                         | Records documenting the handling of unsolicited applications for employment.  | Last action on application + 1 year  |
| Human Resources       | 3.3 Induction, Training and Development | Records containing summary information on workforce training and development needs.   | Current year + 5 years               |
| Human Resources       | 3.3 Induction, Training and Development | Records containing individual feedback on training and development programmes.  | Completion of analysis of feedback   |
| Human Resources       | 3.4 Performance and Reward              | Records documenting pay reviews.  | Current year + 5 years               |
| Human Resources       | 3.4 Performance and Reward              | Records documenting special reward schemes e.g. Merit Reviews.  | Termination of scheme + 5 years      |
| Human Resources       | 3.5 Workforce Welfare                   | Records documenting the monitoring of hours worked by employees, as required by the Regulations cited.  | Date of record + 2 years *           |
| Human Resources       | 3.6 Workforce Relations                 | Records containing (identifiable) individual responses to workforce surveys and consultations.  | Completion of analysis of responses  |
| Human Resources       | 3.6 Workforce Relations                 | Records documenting grievances raised by staff (which do not relate directly to their own contracts of employment), the institution's response, action taken and the outcome. | Last action on case + 6 years        |
| Human Resources       | 3.7 Contracts/Conditions of Employment  | Records documenting an employee's initial application for employment with the institution.  | Termination of employment + 6 years  |

| <b>Responsibility</b> | <b>Class No.</b>                       | <b>Description</b>   | <b>Retention Period</b>                                   |
|-----------------------|--|--|---|
| Human Resources       | 3.7 Contracts/Conditions of Employment | Supporting documentation (e.g. references) for an employee's initial application for employment with the institution. For records documenting pre-employment health screening, see Health & Safety Management, Employee Health Surveillance. | Completion of appointment                                 |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting an employee's subsequent applications for other jobs within the institution.   | Termination of relationship with student + 6 years        |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting an employee's contract(s) of employment with the institution.  | Termination of employment + 6 years                       |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting changes to an employee's terms and conditions of employment.   | Termination of employment + 6 years                       |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting the job descriptions of positions held by an employee within the institution.  | Duration of job + 1 year                                  |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting induction programmes attended by an employee.  | Completion of induction + 1 year                          |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting an employee's identified training and development needs, and the action taken to meet these needs.   | Completion of actions + 5 years                           |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting job-specific statutory / regulatory training requirements for an employee, and the training provided to meet these requirements.   | Expiry of certification + 6 years OR Superseded + 6 years |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting routine assessments of an employee's performance, and any consequent action taken.   | Superseded + 3 years                                      |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting disciplinary proceedings against an employee, where employment continues.  | Closure of case + 6 years                                 |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting disciplinary proceedings against an employee, where employment does not continue.  | Closure of case + 6 years                                 |

| <b>Responsibility</b> | <b>Class No.</b>                       | <b>Description</b>  | <b>Retention Period</b>              |
|-----------------------|--|---|--------------------------------------|
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting an employee's remuneration and rewards (e.g. bonuses, merit awards, long service awards).   | Current year + 3 years               |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records relating to the administration of an employee's contractual holiday entitlement.  | Current Year+ 1                      |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting the authorisation and administration of special leave, e.g. compassionate leave, study leave.   | Current year + 1 year                |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting an employee's absence due to sickness.  | Termination of employment + 40 years |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting the authorisation and administration of statutory leave entitlements, e.g. parental leave.  | Completion of entitlement + 6 years  |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting entitlements to, and calculations of, Statutory Maternity Pay.  | Current tax year + 3 years           |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records containing an employee's basic personal details (e.g. address, next of kin, emergency contacts).  | While current                        |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting pre-employment health screening of an employee: employees exposed to hazardous substances during employment.                          | Termination of employment + 40 years |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting major injuries to an employee arising from accidents in the workplace.  | Termination of employment + 40 years |
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting an employee's termination of employment by voluntary resignation, redundancy, retirement (including on medical grounds) or dismissal. | Termination of employment + 6 years  |

| <b>Responsibility</b> | <b>Class No.</b>                       | <b>Description</b>   | <b>Retention Period</b>               |
|-----------------------|--|--|---------------------------------------|
| Human Resources       | 3.7 Contracts/Conditions of Employment | Records documenting references provided in confidence in support of an employee's application(s) for employment by another organisation.   | Provision of reference + 1 year       |
| Human Resources       | 3.8 Pensions                           | Records documenting the institution's relationships with pension schemes to which all or part of its workforce belong.   | Termination of relationship + 5 years |
| Human Resources       | 3.8 Pensions                           | Records documenting routine communications with the pension schemes. For administration of individual employees' relationships with the pension schemes, use Employee Contract Management. | Current year + 5 years                |
| Human Resources       | 3.8 Pensions                           | For administration of individual employees' relationships with the pension schemes, use Employee Contract Management.  | NA                                    |
| Human Resources       | 3.9 Trades Unions/Industrial Relations | Records documenting routine communications with trade union representatives, including minutes of meetings.  | Current year + 20 years               |
| Human Resources       | 3.9 Trades Unions/Industrial Relations | Records documenting consultations/negotiations with trades unions on specific issues.  | Last action on issue + 20 years       |
| Estates               | 4.1 Estate Management                  | CCTV Recordings.   | Creation +1 Month                     |
| Estates               | 4.1 Estate Management                  | Records of security passes issued to visitors.   | Expiry of pass + 1 year               |
| Estates               | 4.1 Estate Management                  | Records of security passes issued to employees, other staff and students.  | Expiry of pass + 1 year               |
| Estates               | 4.1 Estate Management                  | Records documenting the conduct of routine security surveillance of properties.  | Creation +1 Month                     |
| Estates               | 4.1 Estate Management                  | Records documenting security breaches or incidents, and action taken.  | Last action on incident + 1 year      |
| Estates               | 4.4 Health and Safety                  | Records documenting notifications of appointments of safety representatives by trade unions under the Safety Representatives and Safety Committees Regulations 1977.                       | Termination of appointment + 1 year   |

| <b>Responsibility</b> | <b>Class No.</b>      | <b>Description</b>  | <b>Retention Period</b>             |
|-----------------------|-----------------------|---|-------------------------------------|
| Estates               | 4.4 Health and Safety | Records documenting the provision of time off, and other facilities and assistance, for safety representatives appointed under the Safety Representatives and Safety Committees Regulations 1977.                                     | Current year + 5 years              |
| Estates               | 4.4 Health and Safety | Records documenting consultations and other communications with safety representatives appointed under the Safety Representatives and Safety Committees Regulations 1977.   | Current year + 50 years             |
| Estates               | 4.4 Health and Safety | Records documenting the election of members of a safety committee formed under the Safety Representatives and Safety Committees Regulations 1977.   | Termination of membership + 1 year  |
| Estates               | 4.4 Health and Safety | Records documenting the election of representatives of employee safety under the Health and Safety (Consultation with Employees) Regulations 1996.  | Termination of appointment + 1 year |
| Estates               | 4.4 Health and Safety | Records documenting consultations and other communications with representatives of employee safety elected under the Health and Safety (Consultation with Employees) Regulations 1996, or with all employees directly.                | Current year + 50 years             |
| Estates               | 4.4 Health and Safety | Records documenting the provision of training (specifically related to their functions as representatives) for representatives of employee safety elected under the Health and Safety (Consultation with Employees) Regulations 1996. | NA                                  |
| Estates               | 4.4 Health and Safety | Records documenting the provision of time off, and other facilities and assistance, for representatives of employee safety appointed under the Health and Safety (Consultation with Employees) Regulations 1996.                      | Current year + 5 years              |

| <b>Responsibility</b> | <b>Class No.</b>      | <b>Description</b>   | <b>Retention Period</b>                 |
|-----------------------|-----------------------|--|---|
| Estates               | 4.4 Health and Safety | Records documenting the provision of information, instruction and training for employees, students and others on health and safety in the institution's premises.  | Current year + 5 years                  |
| Estates               | 4.4 Health and Safety | Records documenting the content of information and instruction on health and safety matters provided for members of the public and others who have legitimate access to the premises, and the methods of delivery. | superseded+ 5 years                     |
| Estates               | 4.4 Health and Safety | List of employees exposed to Group 3 or Group 4 biological agents (defined in the Regulations).  | Last entry + 40 years                   |
| Estates               | 4.4 Health and Safety | Records documenting accidents and incidents involving Group 3 or Group 4 biological agents (defined in the Regulations).   | Date of recording + 40 years *          |
| Estates               | 4.4 Health and Safety | Records documenting the examination, testing and repair of plant and equipment provided to control exposure to substances hazardous to health.   | Date of examination                     |
| Estates               | 4.4 Health and Safety | Records documenting the conduct and results of monitoring of exposure of employees to substances hazardous to health: general exposure.  | Date of action + 5 years                |
| Estates               | 4.4 Health and Safety | Records documenting the conduct and results of monitoring of exposure of employees to substances hazardous to health: exposure of identifiable individual employees.   | Date of monitoring + 40 years           |
| Estates               | 4.4 Health and Safety | Records documenting air monitoring conducted in accordance with the requirements of the Regulations: where exposure requires individual employees to be under medical surveillance under Regulation 10.            | Date of monitoring + 40 years           |
| Estates               | 4.4 Health and Safety | Health surveillance records of identifiable individual employees who are exposed to lead.  | Date of last entry on record + 40 years |

| <b>Responsibility</b> | <b>Class No.</b>      | <b>Description</b>   | <b>Retention Period</b>                                      |
|-----------------------|-----------------------|--|--|
| Estates               | 4.4 Health and Safety | Records documenting the conduct and results of risk assessments of work which exposes employees to asbestos: where the exposure of employees may exceed the action level.                            | Duration of work to which assessment relates                 |
| Estates               | 4.4 Health and Safety | Records documenting the conduct and results of risk assessments of work which exposes employees to asbestos: in all other cases.   | Completion of work to which the assessment relates + 5 years |
| Estates               | 4.4 Health and Safety | Records documenting air monitoring conducted in accordance with the requirements of the Regulations: where exposure requires health records to be kept for individual employees under Regulation 21. | Date of monitoring + 40 years                                |
| Estates               | 4.4 Health and Safety | Records documenting air monitoring conducted in accordance with the requirements of the Regulations: in all other cases.   | Date of monitoring + 5 years                                 |
| Estates               | 4.4 Health and Safety | Health surveillance records of identifiable individual employees who are exposed to asbestos.  | Date of last entry on record + 40 years                      |
| Estates               | 4.4 Health and Safety | Certificates of medical examination of identifiable individual employees who are exposed to asbestos.  | Date of certificate + 40 years                               |
| Estates               | 4.4 Health and Safety | Records documenting the recording of accidents, dangerous occurrences and outbreaks of notifiable diseases on the institution's premises.  | Date of recording + 3 years                                  |
| Estates               | 4.4 Health and Safety | Records documenting the investigation of accidents, dangerous occurrences and outbreaks of notifiable diseases on the institution's premises.  | Closure of investigation + 40 years                          |
| Estates               | 4.4 Health and Safety | Reporting of reportable accidents, dangerous occurrences and outbreaks of notifiable diseases to enforcing authorities.  | Date of notification + 3 years                               |

| <b>Responsibility</b> | <b>Class No.</b>      | <b>Description</b>   | <b>Retention Period</b>                     |
|-----------------------|-----------------------|--|---|
| Estates               | 4.4 Health and Safety | Records documenting accidents and incidents involving Group 3 or Group 4 biological agents (defined in the Regulations).                                   | Date of recording + 40 years                |
| Estates               | 4.4 Health and Safety | Records documenting pre-employment health screening of an employee.  | Termination of employment + 40 years        |
| Estates               | 4.4 Health and Safety | Health (surveillance) records of identifiable individual employees, other than those specified below.  | Date of last surveillance action + 40 years |
| Estates               | 4.4 Health and Safety | Health (surveillance) records of identifiable individual employees who are exposed to substances hazardous to health, as defined by the Regulations cited. | Date of last entry on record + 40 years     |
| Estates               | 4.4 Health and Safety | Health (surveillance) records of identifiable individual employees who are exposed to lead, as required by the Regulations cited.                          | Date of last entry on record + 40 years     |
| Estates               | 4.4 Health and Safety | Health (surveillance) records of individual employees who are exposed to asbestos, as required by the Regulations cited.                                   | Date of last entry on record + 40 years     |
| Estates               | 4.4 Health and Safety | Certificates of medical examinations of individual employees who are exposed to asbestos, as required by the Regulations cited.                            | Date of last entry on record + 40 years     |
| Estates               | 4.4 Health and Safety | Records documenting the nomination/appointment of fire wardens.  | Termination of appointment                  |
| Estates               | 4.4 Health and Safety | Records documenting the provision of role-specific training for fire wardens.  | Termination of appointment + 5 years        |
| Estates               | 4.4 Health and Safety | Records documenting the appointment of official first aiders.  | Termination of appointment                  |

| <b>Responsibility</b> | <b>Class No.</b>                                 | <b>Description</b>   | <b>Retention Period</b>                       |
|-----------------------|--|--|---|
| Estates               | 4.4 Health and Safety                            | Records documenting the provision of approved training (specifically related to their functions as first aiders) for first aiders. | Termination of appointment + 5 years          |
| Estates               | 4.5 Environmental Management                     | Records documenting the recording of environmental incidents on the institution's premises or caused by its operations.            | Last action on incident + 40 years            |
| Estates               | 4.5 Environmental Management                     | Records documenting the investigation of environmental incidents on the institution's premises or caused by its operations.        | Closure of investigation + 40 years           |
| Estates               | 4.5 Environmental Management                     | Records documenting the notification and reporting of reportable environmental incidents to enforcing authorities.                 | Date of notification + 5 years                |
| Estates               | 4.5 Environmental Management                     | Register of 'special waste' removed from the premises for disposal by registered / licensed contractors.                           | Removal of waste consignment + 3 years        |
| Student Support       | 5.3 Student Recruitment                          | Records documenting the handling of enquiries from prospective students.   | Current academic year + 1 year                |
| Student Support       | 5.4 Student Admission Policies and Procedures    | Records documenting the handling of applications for admission: successful applications.   | End of student relationship + 6 years         |
| Student Support       | 5.4 Student Admission Policies and Procedures    | Records documenting the handling of applications for admission: unsuccessful applications.   | Current academic year + 1 year                |
| Student Support       | 5.4 Student Admission Policies and Procedures    | Records documenting the administration of the clearing process.  | Current academic year + 1 year                |
| Student Support       | 5.5 Student Admission and Registration/Enrolment | Records documenting the initial assessment of Students.  | Termination of student relationship + 6 years |
| Student Support       | 5.6 Student Record Administration                | Records of administration of Student Financial and employment support.   | Current + 6 Years                             |

| <b>Responsibility</b> | <b>Class No.</b>                                 | <b>Description</b>   | <b>Retention Period</b>  |
|-----------------------|--|--|--|
| Student Support       | 5.8 Student Discipline                           | Records documenting the conduct and results of disciplinary proceedings against individual students.   | Last action on case + 6 years  |
| Student Support       | 5.9 Student Support and Welfare Management       | Records documenting the provision of Welfare / Advice Services to individual students.   | current year +6 years  |
| Student Support       | 5.9 Student Support and Welfare Management       | Records Relating to Careers Advice.  | Duration of enrolment +3 years   |
| Student Support       | 5.9 Student Support and Welfare Management       | Records relating to Learning Support for Students with specific needs.   | Current +7 Years   |
| Student Support       | 5.9 Student Support and Welfare Management       | Records documenting the handling of user / customer complaints about a student support service.  | Last action on complaint + 6 years   |
| Student Support       | 5.11 Student Complaint Handling                  | Records documenting the handling of complaints by individual students where the formal complaints procedure is not initiated.                            | Last action on complaint + 3 years   |
| Student Support       | 5.12 Student Associations and Unions             | Records relating to the operation and activities of the Students Union, and other clubs, associations and non-academic activities organised by students. | Permanent  |
| Student Information   | 5.5 Student Admission and Registration/Enrolment | Records documenting the registration of individual students on programmes.   | Termination of student relationship + 6 years  |
| Student Information   | 5.6 Student Record Administration                | Records containing full personal data on individual students.  | Minimum required. Variable for different types of personal data.   |
| Student Information   | 5.6 Student Record Administration                | Core student data.   | This is the minimal record kept to provide references for former students required for at least 10 years |

| <b>Responsibility</b> | <b>Class No.</b>                                   | <b>Description</b>  | <b>Retention Period</b>                            |
|-----------------------|--|---|--|
| Student Information   | 5.6 Student Record Administration                  | Records containing standard analyses of data from individual students' records.   | Current academic year + 5 years                    |
| Student Information   | 5.6 Student Record Administration                  | Records documenting the handling of requests for ad hoc analyses of data from individual students' records.                     | Last action on request + 1 year                    |
| Student Information   | 5.6 Student Record Administration                  | Records documenting the handling of individual students' / employers requests for statements of results/transcripts.            | Last action on request + 1 year                    |
| Student Information   | 5.6 Student Record Administration                  | First Destination Surveys: individual responses.  | Completion of analysis of responses                |
| Student Information   | 5.7 Student Progress and Assessment Administration | Records documenting the organisation of examination facilities, including special arrangements for students with special needs. | Current academic year + 1 year                     |
| Student Information   | 5.7 Student Progress and Assessment Administration | Records documenting the termination of individual students' programmes.   | Termination of student relationship + 6 years      |
| Student Information   | 5.7 Student Progress and Assessment Administration | Records documenting the selection, appointment and training of external examiners.  | Termination of appointment + 1 year                |
| Student Information   | 5.7 Student Progress and Assessment Administration | Records documenting the withdrawal of individual students from the institution.   | Termination of relationship with student + 6 years |
| Student Information   | 5.7 Student Progress and Assessment Administration | Records documenting the control of examination papers and examination scripts.  | Current academic year + 1 year                     |
| Student Information   | 5.7 Student Progress and Assessment Administration | Arrangements for Assessments and examinations.  | Current year + 6 years                             |

| <b>Responsibility</b> | <b>Class No.</b>  | <b>Description</b>  | <b>Retention Period</b>                                    |
|-----------------------|---|---|--|
| Student Information   | 5.7 Student Progress and Assessment Administration      | Pass/Qualification/Awards lists.  | Completion of Programme+ 10 years                          |
| Programme Areas       | 5.5 Student Admission and Registration/Enrolment        | Records documenting the registration of individual students on programmes.  | Termination of student relationship + 6 years              |
| Programme Areas       | 5.7 Student Progress and Assessment Administration      | Records documenting individual students' submission of assessed work and handling of reports of mitigating circumstances.                         | Current academic year + 1 year (Minimum)                   |
| Programme Areas       | 5.7 Student Progress and Assessment Administration      | Records documenting feedback on academic progress, and general academic guidance and support, given to individual taught students.                | Completion of student's programme + 6 years                |
| Programme Areas       | 7.4 Development and Execution of Programmes and Courses | Records documenting routine solicited feedback on taught programmes from staff and examiners: individual feedback.                                | Current academic year + 5 years OR Life of course + 1 year |
| Programme Areas       | 7.5 Internal and External Review of Courses             | Records documenting routine solicited feedback on taught courses from staff and examiners: individual feedback.                                   | Current academic year + 5 years OR Life of course + 1 year |
| Programme Areas       | 7.5 Internal and External Review of Courses             | Records documenting routine solicited feedback on taught courses from students: individual feedback.  | Completion of analysis of feedback                         |
| Programme Areas       | 5.7 Student Progress and Assessment Administration      | Records documenting the academic progress of individual students and formal action taken by the institution to deal with unsatisfactory progress. | Termination of relationship with student + 6 years         |
| Programme Areas       | 7.6 Course Administration                               | Assignment of students to classes/groups.   | Current year + 1 year                                      |
| Programme Areas       | 7.6 Course Administration                               | Course Assignment Registers.  | Current year + 1 year                                      |

| <b>Responsibility</b>                 | <b>Class No.</b>                                      | <b>Description</b>   | <b>Retention Period</b>                                |
|---------------------------------------|---|--|--|
| Organisational Development and Talent | 5.11 Student Complaint Handling                       | Records documenting the handling of formal complaints made by individual students against the institution.   | Last action on case + 6 years                          |
| Quality                               | 5.10 Student Liaison                                  | Results of user / customer surveys: individual responses.  | Completion of analysis of survey responses             |
| ILT                                   | 6.1 Information Resources Management                  | Records documenting the handling of requests for access to personal information held by the institution under the Data Protection Act 1998.  | Last action on request + 6 years                       |
| ILT                                   | 6.1 Information Resources Management                  | Records containing (anonymised) management statistics, analyses and reports of requests for access to personal information held by the institution under the Data Protection Act 1998. | Current year + 10 years                                |
| ILT                                   | 6.1 Information Resources Management                  | Records documenting the development and maintenance of the institution's Publication Scheme, as required by the Freedom of Information Acts.   | Completion of revision of Publication Scheme + 5 years |
| ILT                                   | 6.1 Information Resources Management                  | Records documenting the handling of requests for access to information held by the institution under the Freedom of Information Acts.  | Last action on request + 6 years                       |
| ILT                                   | 6.1 Information Resources Management                  | Records documenting authorisation for the disposal of de-accessioned records.  | Life of archives                                       |
| ILT                                   | 6.3 Information and Communications Systems Management | Records documenting user requests to recover data from backup or archive stores, and action taken.   | Last action on request + 3 months                      |
| ILT                                   | 6.3 Information and Communications Systems Management | Records documenting routine monitoring of the use of ICT systems to ensure compliance with legal requirements and institutional policies.  | Current year + 1 year                                  |
| ILT                                   | 6.3 Information and Communications Systems Management | Requests for, and authorisation of, connections of third party equipment to the institution's networks, either on institutional premises or via dial-up communications links.          | Termination of connection + 1 year                     |

| <b>Responsibility</b> | <b>Class No.</b>                                      | <b>Description</b>  | <b>Retention Period</b>            |
|-----------------------|---|---|------------------------------------|
| ILT                   | 6.3 Information and Communications Systems Management | Records documenting the removal / return of mobile ICT systems hardware and software from / to the institution's premises.  | Return of equipment + 3 months     |
| ILT                   | 6.3 Information and Communications Systems Management | Records documenting the development of technical and application training for ICT system users.   | Superseded + 1 year                |
| ILT                   | 6.3 Information and Communications Systems Management | Records documenting user requests for technical and application support, and assistance provided.   | Last action on request + 1 year    |
| ILT                   | 4.3 ICT Systems Management                            | Records documenting faults reported by users of ICT systems, and action taken to investigate and resolve the problem.   | Last action on fault + 1 year      |
| ILT                   | 4.3 ICT Systems Management                            | Records documenting the opening, maintenance and closure of user accounts for ICT systems.  | Closure of account + 1 year        |
| ILT                   | 4.3 ICT Systems Management                            | Records documenting routine monitoring of the use of ICT systems to ensure compliance with legal requirements and institutional policies.                                     | Current year + 1 year              |
| ILT                   | 4.3 ICT Systems Management                            | Records documenting attempted or actual security breaches of the institution's ICT systems, and action taken.   | Last action on incident + 1 year   |
| ILT                   | 4.3 ICT Systems Management                            | Requests for, and authorisation of, connections of third party equipment to the institution's networks, either on institutional premises or via dial-up communications links. | Termination of connection + 1 year |
| ILT                   | 4.3 ICT Systems Management                            | Records documenting the removal / return of mobile ICT systems hardware and software from / to the institution's premises.  | Return of equipment + 3 months     |
| ILT                   | 4.3 ICT Systems Management                            | Records documenting the development of technical and application training for ICT system users.   | Superseded + 1 year                |

| <b>Responsibility</b> | <b>Class No.</b>                       | <b>Description</b>  | <b>Retention Period</b>                 |
|-----------------------|--|---|---|
| ILT                   | 4.3 ICT Systems Management             | Records documenting user requests for technical and application support, and assistance provided.   | Last action on request + 1 year         |
| Directorate           | 8.1 Government and Regulator Relations | Records containing information that institutions are legally obliged to provide to the funding Bodies.                                    | Permanent                               |
| Directorate           | 8.1 Government and Regulator Relations | Reports / Returns made to standards bodies, professional bodies, and other government departments.  | Permanent                               |
| Directorate           | 8.3 Community Relations                | Records documenting enquiries from members of the community and the responses provided.   | Last action of enquiry + 2 years        |
| Directorate           | 8.3 Community Relations                | Records documenting complaints from members of the local community, the internal handling of these complaints and the responses provided. | Last action on complaint + 1 year       |
| Directorate           | 8.6 Fundraising/Grants                 | Records containing details of individual responses to fundraising campaigns.  | Completion of analysis of data          |
| Directorate           | 8.7 Alumni Relations                   | Records containing personal data on individual alumni.  | While current (or likely to be current) |
| Directorate           | 8.7 Alumni Relations                   | Results of alumni surveys: summaries and analyses of responses.   | Completion of survey + 3 years          |
| Directorate           | 1.3 Governing Body                     | Records documenting the appointment of members of the institution's governing body.   | Termination of appointment + 6 years    |
| Directorate           | 1.3 Governing Body                     | Records documenting the provision of training and development for members of the institution's governing body.                            | Current year + 3 years                  |
| Directorate           | 1.3 Governing Body                     | Register of Interests of members of the Governing Body, senior staff and others covered by conflict of interest policies.                 | Termination of appointment + 6 years    |
| Directorate           | 1.4 Management of Executive Committees | Records documenting the provision of training and development for members of the institution's executive committees.                      | Current year + 3 years                  |

| <b>Responsibility</b> | <b>Class No.</b>                     | <b>Description</b>   | <b>Retention Period</b>              |
|-----------------------|--------------------------------------|--|--------------------------------------|
| Directorate           | 1.5 Appointment of Senior Officers   | Records documenting the appointment and designation of the institution's senior officers.                                    | Termination of appointment + 5 years |
| Directorate           | 1.9 Quality Management               | Public Complaints.   | 3 years                              |
| Directorate           | 6.1 Information Resources Management | Records documenting the institution's notification of data controller details to the Office of the Information Commissioner. | Expiry of notification + 6 years     |