

1. Scope

All Luminate Education Group records, whether analogue or digital, are subject to the retention requirements of this procedure. The Luminate Education Group has adopted the JISC (FE and HE Information Governance) recommendations for record grouping and retention periods.

2. Responsibilities

- 2.1 The following roles are responsible for retention of these records. They are the information asset resource owners.
- 2.2 Asset resource owners are/responsible for ensuring that all personal data is collected, retained and destroyed in line with the requirements of the GDPR.
- 2.3 The Group Chief Financial Officer (CFO) is responsible for the retention of financial (payroll, accounting, tax) and related records.
- 2.4 The Group Director of People is responsible for retention of all HR records.
- 2.5 The Head of Health and Safety is responsible for retention of all Health and Safety records.
- 2.6 The Director of Governance is responsible for retention of all other statutory and regulatory records.
- 2.7 The Data Protection Officer / GDPR Owner is responsible for electronic storage and security of data in line with this procedure.
- 2.8 The Director of Estates is responsible for ensuring that retained records are included in business continuity and disaster recovery plans.

3. Procedure

- 3.1 The required retention periods, by record group, are recorded in (Retention of Records Document – 'Luminate Education Group Records Retention Management Schedule-JISC-Recommendations-2019-1' under the following categories:

- 3.1.1 Function
- 3.1.2 Activity
- 3.1.3 Record Group
- 3.1.4 Retention Period
- 3.1.5 Citations and Notes

- 3.2 The procedure for accessing stored data is detailed in the ITSS Access Control Rules in the IT Policies and Procedures Policy. Resource owners control and allow or deny access to their departmental data.

- 3.3 Data stored in the Cloud (Microsoft Office 365) allows the resource owner to share and remove access to their documents. Sharepoint site controls in place allows 'site owners' to provide and remove access to the sites and documents stored.
- 3.4 The Data Protection Officer / GDPR Owner and Resource Owners are responsible for destroying data once it has reached the end of the retention period as specified in the retention document Luminate Education Group Records Retention Management Schedule-JISC-Recommendations-2019-1.
- 3.5 Portable/removable storage media are destroyed in line with the Information Security Policy ISMS001 Information Security Management Policy.

Document Owner and Approval

The Luminate Director of IT is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of the Luminate Education Group.

This procedure is issued on a version controlled basis.

Change History Record

Issue	Description of Change	Date of Policy
1.0	Initial issue	05/11/2017
1.1	Annual Review	18/11/2018
1.2	Annual Review – Responsibilities updated	21/11/2019
1.3	Annual Review – Luminate Education Group	02/11/2020
1.4	Annual Review – Privacy Notices updated	30/10/2021
1.5	Annual Review and update	11/11/2022
1.6	Reviewed	26/09/2023
1.7	Annual Review – Full check	08/10/2024
1.8	Annual Review – No Amendments	25/06/2026