

# DATA RETENTION POLICY

## AUGUST 2025

Information Governance Group  
Version Number 3

The Royal Academy of Music moves music forward by inspiring successive generations of musicians to connect, collaborate and create.  
Charity number 310007  
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**UNIVERSITY  
OF LONDON**

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## 1. AIMS

This policy sets out the Academy's structured approach to the review and disposal of its records.

## 2. LEGISLATION AND GUIDANCE

This policy is aligned to the provisions of the Data Protection Act 2018 and UK General Data Protection Regulation (GDPR). It is also based on guidance published by the Information Commissioner's Office (ICO) on storage limitation.

This policy upholds the requirement that personal data is kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. As part of this requirement the Academy:

- Continually assesses the data held and why it is needed.
- Carefully considers how long personal data is kept.
- Regularly reviews and erases or anonymises personal data when it is no longer needed.
- Has processes in place to comply with requests for erasure under the 'right to be forgotten'.
- Identifies any personal data that needs to be retained for public interest archiving, scientific or historical research, or statistical purposes.

## 3. RETENTION PERIODS

The GDPR does not specify time limits for different types of data and allows organisations to set appropriate retention periods based on the purposes for processing. The tables on the following pages are intended to establish standard retention periods for different categories of personal data. There may be cause for discretion where, for example, early deletion is possible as the data is no longer needed, or it is deemed necessary to keep to data for longer due to a risk of litigation or a request from an outside body.

## 4. DISPOSAL OF RECORDS

Where data is no longer needed, it will be anonymised or securely destroyed. This applies to paper records, electronic information and biometric information. For example, we will shred paper-based records and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the Academy's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

## 5. LINKS WITH OTHER POLICIES

This retention policy is linked to our:

- Data Protection Policy
- Privacy Notice; Enrolled Students
- Privacy Notice; Job Applicants and Employees
- Privacy Notice; Junior Academy Students
- Privacy Notice; External Parties
- Privacy Notice; Governing Body (Trustees) and External Committee Members

## 6. MONITORING ARRANGEMENTS

The Data Protection Officer (DPO) is responsible for monitoring and reviewing this Policy in collaboration with the Academy's Information Governance Group of the Academy. The Policy will be reviewed and updated if any changes are made to legislation that affect the Academy's practice. Otherwise, this policy will be reviewed on an annual basis.

## 7. FURTHER INFORMATION ON RETENTION OF DEPARTMENTAL RECORDS

For more specific and detailed information on the retention on records containing personal data at a departmental level please see data processing entries on The Compliance Space; accessed via the Data Protection area of SharePoint (Intranet).

Part B of this Policy details the retention for documentation and associated records which do not generally containing personal data, e.g. institutional policies, annual and strategic planning documents etc.

## PART A – RECORDS CONTAINING PERSONAL DATA

This part of the policy is sub-divided into the following client groups (please click links below):

- Students
- Governing Body
- Staff
- External parties
- Junior Academy students
- Financial records

Note: Contextual data includes information relating to any concerns, complaints, investigations, disciplinary processes and appeals, including criminal convictions and offences, during applications and/or periods of studentship or employment.

Item	Purpose	Category of data	Data owned by (department/s)	Retention period	Reason for retention (operational, regulatory, legal)
<b>1</b>	<b>STUDENTS</b>				
1.1	To enrol students including the creation and ongoing maintenance of student records using biographical information	Identity Contact Contextual	Registry	6 years post completion/withdrawal /graduation	Regulatory Legal
1.2	To process and deliver educational services directly relating to studentships including: <ul style="list-style-type: none"> <li>• Timetabling</li> <li>• Assessment and monitoring of academic progress</li> <li>• Managing fee payments</li> <li>• Bursary administration</li> <li>• Student finance (SLC, HEBBS, US Loans)</li> <li>• Hardship applications</li> </ul>	Identity Contact Financial	Registry	6 years post completion/withdrawal /graduation	Regulatory Legal

	<ul style="list-style-type: none"> <li>ERASMUS and other student exchanges</li> <li>Visa administration</li> <li>Supplying letters for council tax exemption, bank accounts, etc</li> <li>Degree certificate production</li> </ul>				
1.3	Security	Image (CCTV footage)	Estates	30 days or until superseded unless retained as part of an internal investigation or legal process	Regulatory
1.4	To capture student image in video footage, audio or photographs for the purpose of promoting the Academy	Image	Advancement	Video footage, audio and/or photographs may be held in perpetuity as part of the Academy's historic archive	Operational
1.5	To offer and administer paid working opportunities for students in Academy departments	Identity Contact Financial	Registry Finance Museum and Collections	Duration of employment/activity, plus 1 academic year	Operational Legal
1.6	To supply students with support as and when required, including the administration of Personal Learning Plans and Extension/Deferrals applications	Identity Contact Special Category Contextual	Student and Staff Health and Wellbeing Academic Secretariat	7 years from first point of student contact	Legal Operational
1.7	To maintain an archive of student records (a base level of information held on file for reference purposes and as a public record)	Basic studentship	Registry	Retained in perpetuity	Operational Legal
1.8	To meet obligations for statutory reporting to HESA and the Office for Students	Identity Special Category	Registry	Electronic data held in HESA workbench and	Legal

				submitted via the HESA collection system	
1.9	Provision of photographs to external organisations for PR/marketing purposes or to third party organisations (eg production imagery)	Identity Image	Advancement Performance Principal Study Depts Museum and Collections	In perpetuity as part of the Academy's historic archive	Operational
1.10	To maintain electronic student records via the Academy's student record system	Identity Contact Special Category Contextual data Basic student data Financial data	Registry	Retained for 6 years post completion, withdrawal, graduation with basic student data being retained in perpetuity	Operational Legal
1.11	To respond to a request from an Electoral Registration Officer (ERO) in order for students to be registered on the electoral roll	Identity Contact	Registry	The period of the processing activity (sharing of data)	Legal
1.12	Maintaining relationships with donors/funding organisations/ trusts and foundations who may be supporting student studies	Identity Contact Contextual	Registry	Duration of studentship	Operational
1.13	To meet HE sector obligations for engaging with the National Student Survey and Graduate Outcomes	Identity Contact	Registry	The period of the processing activity (sharing of data) with an anonymised report held in perpetuity	Legal
1.14	Student Tier 4/Student Route application and approval for external paid and unpaid work opportunities	Identity Contact Financial	Performance	Length of studentship plus 6 years	Legal
1.15	Audiometric Testing	Identity Contact	Performance	In perpetuity	Legal

		Special Category Contextual			
1.16	Case management and investigations including disciplinary, wellbeing and safeguarding concerns in relation to students	Identity Contact Special Category Image/CCTV footage Contextual	Registry HR	10 years or duration of studentship except where legislation requires the data to be kept for longer  Records known to relate to allegations or cases of sexual abuse will be retained for 75 years with appropriate review periods (as aligned with the IICSA recommendation)	Legal Operational
1.17	To administer student composers and performers who are participating in the Art Mentor Lucerne scheme but will have left the Academy before the scheme ends	Identity Contact	Research Office	4 years. The project scheme is 3 years, with reporting to the Art Mentor Foundation Lucerne required post-project	Operational
1.18	Production of ID/Access cards (students)	Identity Contact Image (photograph)	Estates	For the period of studentship	Operational

Item	Purpose	Category of data	Data owned by (department/s)	Retention period	Reason for retention (operational, regulatory, legal)
<b>2</b>	<b>GOVERNING BODY (TRUSTEES) AND EXTERNAL COMMITTEE MEMBERS</b>				
2.1	To appoint Independent Members of the Governing Body and Trustees or external members of committees	Identity Contact Contextual	SMT	Retained in perpetuity as part of the	Operational



		Financial Image Special Category		Academy's historic archive	
2.2	Annual declaration of interests for the Academy's Register of Interests	Identity Contextual	SMT	3 years	Legal Regulatory
2.3	Security; capture of CCTV footage	Image (CCTV footage)	SMT	30 days unless retained as part of an internal investigation or legal process	Regulatory
2.4	To capture images in video footage or photographs for the purpose of promoting the Academy	Image	SMT	Video footage and/or photographs may be held in perpetuity as part of the Academy's historic archive	Operational
2.5	To meet obligations for statutory reporting, for instance to the Charity Commission and Companies House	Identity Contact Special Category	SMT	In perpetuity	Legal
2.6	To meet our obligations to provide audited end of year financial statements.	Identity	SMT	In perpetuity	Legal
2.7	To meet our obligations for statutory reporting to HESA and the Office for Students	Identity Contact Special Category	SMT	Electronic data held in HESA workbench and submitted via the HESA collection system	Legal
2.8	To meet the requirements of our service providers, such as internal and external auditors, bankers and insurers	Identity Contact Special Category	SMT Museum and Collections	Duration of appointment plus 2 years	Legal
2.9	To meet our obligations in answering Freedom of Information requests.	Identity	SMT	6 years	Legal

2.10	Sending photographs to external organising for PR/marketing purposes or to third party organisations (eg production imagery)	Image	SMT Advancement Museum and Collections	In perpetuity as part of the Academy's historic archive	Operational
2.11	Maintaining relationships with donors/funding organisations/trusts	Identity Contact Contextual Financial	SMT Philanthropy Museum and Collections	In perpetuity as part of the Academy's historic archive	Operational

Item	Purpose	Category of data	Data owned by (department/s)	Retention period	Reason for retention (operational, regulatory, legal)
<b>3</b>	<b>STAFF</b>				
3.1	To manage the recruitment process, including the appointment of successful candidates	Identity Contact Contextual Financial Image Special Category	HR	Academy employees: for the duration of employment and for a period of time after employment has ended, depending on the kind of data and in accordance with legal and contractual obligations. The majority of HR data is kept for 6 years from leaving date, following which basic summary data is retained so that an employment history can be confirmed in reference requests	Legal Operational

				<p>Workers and students working at the Academy: for the duration of engagement plus 1 academic year</p> <p>Job Applicants: until completion of the recruitment process plus 6 months</p>	
3.2	To carry out pre-employment/ engagement checks and assess the working capacity of employees, workers or job applicants, including right to work, medical reports, financial security checks (for roles with budgetary responsibility), references and Disclosure and Barring Service (DBS) checks	Identity Contact Contextual Financial Image Special Category	HR	Duration of employment plus 6 years	Operational Legal
3.3	To manage all HR contractual processes, including the probationary period, absence management, and disciplinary and grievance processes	Identity Contact Contextual Financial Image Special Category	HR	<p>Duration of employment plus 6 years, except where legislation relating to disciplinary matters requires the data to kept for longer.</p> <p>Records with regard to issues of safeguarding, relating to students aged under 18 years, will be retained until normal retirement age</p>	Operational Legal

				or 10 years whichever is the greater	
3.4	To administer payment processes including payroll, pension enrolment, pension payment, staff benefits, expense claims and invoices from self-employed personal service providers	Identity Contact Contextual Financial Image Special Category	HR	Duration of employment plus 6 years	Operational Legal
3.5	To support professional development, training, job evaluation and workforce planning	Identity Contact Contextual Special Category	HR	Duration of employment plus 6 years	Operational
3.6	To manage the health, safety and wellbeing of all and facilitating additional requirements or reasonable adjustments where necessary (i.e. in respect of declared disability, religion and other protected characteristics)	Identity Contact Contextual Special Category	HR	Duration of employment plus 6 years	Operational Legal Regulatory
3.7	To process equal opportunities data for Higher Education Statistical Agency (HESA) purposes	Contextual Special Category	HR	Duration of employment plus 6 years	Legal Regulatory
3.8	To ensure access to Academy facilities	Identity Contextual Special Category	HR	Duration of employment	Operational
3.9	To enable us to contact a nominated next of kin and emergency contact	Identity Contact Contextual	HR	Duration of employment plus 6 years	Operational

3.10	To manage leaving the Academy by resignation, redundancy, retirement or dismissal from service	Identity Contact Contextual Special Category	HR	Duration of employment plus 6 years	Operational
3.11	Internal and external auditors; as a public-funded organisation, the Academy is subject to audit and is required on occasion to give the auditors' access to personal details, in order for the integrity of Academy processes to be reported on	Identity Contact Contextual Special Category	HR	Duration of employment plus 6 years	Legal Regulatory
3.12	Fulfilling our obligations under other laws and legislative requirements	Identity Contact Contextual Special Category	HR	Duration of employment plus 6 years	Legal Regulatory
3.13	Security; capture of CCTV footage	Image	Estates	30 days unless retained as part of an internal investigation or legal process	Regulatory
3.14	To capture images in video footage or photographs for the purpose of promoting the Academy	Image	Advancement	Video footage and/or photographs may be held in perpetuity as part of the Academy's historic archive	Operational
3.15	To meet our obligations for statutory reporting to HESA, Office for Students (OfS), United Kingdom Research and Innovation (UKRI), Office for National Statistics (ONS), HM Revenue & Customs (HMRC), UK Visas & Immigration Service (UKVI)	Identity Contact Contextual Special Category	HR	Duration of employment plus 6 years	Legal Regulatory

3.16	External pension providers: Teachers' Pension Scheme (TPS), Group Pension Plan (GPP), Universities Superannuation Scheme (USS) and National Employment Savings Trust (NEST)	Identity Contact Contextual Special Category	HR	Duration of employment plus 6 years	Legal Regulatory
3.17	Sending photographs to external organisations for PR/marketing purposes or to third party organisations (eg production imagery)	Identity Image	HR Advancement	In perpetuity as part of the Academy's historic archive	Operational
3.18	To maintain electronic employment records via the HR database	Identity Contact Contextual Data Special Category Financial data	HR	Duration of employment plus 6 years	Legal Regulatory Operational
3.19	In exceptional circumstances we may also have to share data with an external party without express consent where it is necessary to protect the vital interests, for instance in the case of an emergency or legal proceedings	Identity Contact Contextual Data Special Category	HR	Duration of employment plus 6 years	Legal Regulatory
3.20	For a specific purpose such as when prospective employers, landlords and other external organisations ask us to provide references or in respect of an application for retirement on the basis of ill-health or incapacity	Identity Contact Contextual Financial Image Special Category	HR	Duration of employment plus 6 years	Operational
3.21	Annual declaration of staff interests for the Academy's Register of Interests	Identity Contextual	SMT	3 years	Legal Regulatory

3.22	Administration of project lead and participants of research projects, to be submitted as an impact case studies for REF2029	Identity Special Category	Research Office	10 years; Project data since the last REF2021 to REF2029	Regulatory
3.23	Supporting research applications/grants; financial planning	Identity Financial	Research Office	10 years	Operational
3.24	Submission of information about staff research activity to Research England which determines Academy research funding allocation	Identity	Research Office	Much of the information is on public record and is available to view indefinitely. Academy retention: 10 years	Regulatory
3.25	Production of ID/Access cards (staff)	Identity Contact Image (photograph)	Estates	For the period of employment	Operational

Item	Purpose	Category of data	Data owned by (department/s)	Retention period	Reason for retention (operational, regulatory, legal)
<b>4</b>	<b>EXTERNAL PARTIES (APPLICANTS FOR PROGRAMMES OF STUDY)</b>				
4.1	To operate admissions selection processes	Identity Contact Identity evidence Financial	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Operational Regulatory
4.2	To form the basis of a student record, should you be offered a place to study at the Academy	Identity Contact Identity evidence Financial	Registry	Duration of studentship plus 6 years post completion/withdrawal / graduation or application year plus	Operational Regulatory

				one year (if unsuccessful)	
4.3	To enable effective communication with applicants	Identity Contact	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Operational Regulatory
4.4	To review references as part of application process	Identity	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Operational
4.5	To review video submissions as part application process	Identity	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Operational
4.6	To verify English language test scores and academic qualifications	Identity	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Operational
4.7	To provide evidence that the Academy has met UKVI requirements in relation to the Student Sponsor guidance	Identity Contact Identity evidence Financial	Registry	Duration of Tier 4/ Student visa sponsorship plus 6 years, or duration of studentship plus 6 years, whichever is the greater	Operational Regulatory Legal



4.8	To assess eligibility for an audition fee waiver and transport contribution	Identity Contact Identity evidence Financial Special category	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Legal Operational
4.9	To assess applicant financial support applications	Identity Contact Identity evidence Financial	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Legal Operational
4.10	To assess relevant mitigating circumstances	Identity Contact Identity evidence Financial Special category	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Legal Operational
4.11	To make appropriate reasonable adjustments to the audition process	Identity Contact Identity evidence Financial Special category	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Legal Operational
4.12	To meet the audit requirements of funding providers	Identity Contact Identity evidence Financial Special category	Registry	Duration of studentship (if successful) or application year plus one year (if unsuccessful)	Legal Operational
4.13	To maintain an archive of prospective student applications for historical record	Basic student data	Registry	Retained in perpetuity	Operational

4 EXTERNAL PARTIES (APPLICANTS FOR PROGRAMMES OF STUDY)					
4.14	Gift administration: gift processing	Identity Contact Contextual	Philanthropy Museum and Collections	In perpetuity (record of the gift)	Operational
4.15	Communicating with and processing data for Lower level of donors, who give less than £10k	Identity Contact Contextual	Philanthropy	After 15 years of inactivity	Operational
4.16	Communicating with and processing data for Higher level donors, who give greater than £10k	Identity Contact Contextual	Philanthropy	Case by case review after 15 years of inactivity	Operational
4.17	Researching prospects or potential donor identified by prospect research	Identity Contact Contextual	Philanthropy	One month prior to starting the cultivation process, unless this involves a disproportionate effort or seriously impairs the objectives of the processing	Operational
4.18	Researching prospects or potential donor identified by prospect research but in active cultivation	Identity Contact Contextual	Philanthropy	After 15 years of inactivity	Operational
4.19	Alumni who have been researched as potential donors	Identity Contact Contextual	Philanthropy / Alumni (Communications)	In perpetuity	Operational
4.20	Ticket purchaser only who have been researched as potential donors	Identity Contact Contextual	Owned by Audiences Team, used by Philanthropy as a cold fundraising source	One month prior to starting the cultivation process, unless this involves a disproportionate effort or seriously impairs the objective of the processing	Operational

4.21	Providing alumni references	Identity Contextual	Principal Study	1 year	Operational
<b>4</b>	<b>EXTERNAL PARTIES (OTHER, INCLUDING VISITORS TO THE ACADEMY)</b>				
4.22	To capture image in video footage or photographs for the purpose of promoting the Academy	Identity (photographic image)	Advancement	Video footage and/or photographs may be held in perpetuity as part of the Academy's historical archive	Operational
4.23	Record of objects in the Academy's collection including conservation restoration records, including details of organisations/individuals who undertook the work	Collections object information Identity Contact	Museum and Collections	In perpetuity	Operational
4.24	Security	Identity (image/CCTV footage)	Estates	30 days or until superseded unless retained as part of an internal investigation or legal process	Legal Operational
4.25	Visiting artist contracts	Identity Contact Financial	Performance	In perpetuity to ensure compliance with the Copyright, Designs and Patents Act (1998)	Legal Operational
4.26	External bookings contracts	Identity Contact Financial	Performance	6 years	Legal Operational
4.27	Administration of events including visiting researchers	Identity Contact	Research Office	1 year; with invoices retained, by the Finance Department, for the current year plus 6 years	Operational
4.28	Supporting research applications/grants; financial planning	Identity Financial	Research Office	10 years	Operational

4.29	Administration of project lead and participants of research projects, to be submitted as an impact case studies for REF2029	Identity Special Category	Research Office	10 years; Project data since the last REF2021 to REF2029	Regulatory
4.30	Appointment of Honorary Research Fellows (HRF)	Identity Contextual	Research Office	3 years; An HRF fellowship is 3 years, but an HRF can apply for an extension of fellowship terms	Operational
4.31	Open Academy research involving visiting artists	Identity (including audio/video recording)	Open Academy	Reviewed on a project-by-project basis but retained for no longer than 5 years	Operational
4.32	First Aid Reports (visitors/contractors etc)	Identity Contact Contextual	Estates	Accident reports are kept 3 years from date of the accident or up to 40 years for health-related	Operational Legal
4.33	Production of ID/Access cards (contractors)	Identity Contact Image (photograph)	Estates	For the period of employment	Operational

Item	Purpose	Category of data	Data owned by (department/s)	Retention period	Reason for retention (operational, regulatory, legal)
<b>5</b>	<b>JUNIOR ACADEMY STUDENTS</b>				
5.1	Audition application	Identity Contact Contextual	Junior Academy	Duration of studentship (if successful) or application year plus one year (if unsuccessful. Redacted monitoring data may be kept in perpetuity	Operational

5.2	Student enrolment including the creating and ongoing maintenance of student record	Identity Contact	Junior Academy	Duration of studentship on a Junior Academy programme plus 2 academic years	Operational
5.3	To process and deliver educational services directly relating to studentship: <ul style="list-style-type: none"> <li>• Timetabling</li> <li>• Assessment and monitoring of progress</li> <li>• Managing fee payments</li> <li>• Bursary administration</li> <li>• Scholarships</li> <li>• Photo/video consent</li> </ul>	Identity Contact Financial	Junior Academy	Duration of studentship on a Junior Academy programme plus 2 academic years  7 years (in total) for associated bursary applications  Redacted information then automatically transferred to Junior Academy Alumni Database	Operational
5.4	Security	Image/CCTV footage	Estates	30 days or until superseded unless retained as part of an internal investigation or legal process.	Operational
5.5	To capture image in video footage or photographs for the purpose of promoting the Academy	Identity (video/photographic image)	Junior Academy	Video footage and/or photographs may be held in perpetuity as part of the Academy's historic archive	Operational
5.6	To maintain an archive of student record	Basic studentship	Junior Academy	In perpetuity for historical and statistical purposes	Operational

5.7	Supplying photographs to external organisations for PR/marketing purposes	Identity (video/photographic image)	Junior Academy	In perpetuity as part of the Academy's historic archive	Operational
5.8	To maintain electronic student record via student records system (MSM)	Identity Contact Contextual	Junior Academy	Duration of studentship plus 2 academic years. Redacted data is then transferred to the Junior Academy archive (alumni) record	Operational
5.9	Maintaining relationships with donors/funding organisations/trusts and foundations who may be supporting your studies	Identity Contact Contextual	Junior Academy	Duration of studentship plus 2 academic years	Operational
5.10	Case management and investigations including disciplinary, wellbeing and safeguarding concerns in relation to Junior Academy students	Identity Contact Special Category Image/CCTV footage Contextual	Junior Academy HR Registry	<p>Student data: generally, until the student reaches the age of 25, except where legislation requires the data to kept for longer</p> <p>Records known to relate to allegations or cases of sexual abuse will be retained for 75 years with appropriate review periods (as aligned to NSPCC guidance)</p>	Legal Operational

Item	Purpose	Category of data	Data owned by (department/s)	Retention period	Reason for retention (operational, regulatory, legal)
<b>6</b>	<b>FINANCIAL RECORDS</b>				
6.1	Suppliers paid invoices (including credit notes)	Identity, contact, financial	Finance	Current year plus 6 years	Legal
6.2	Staff expense claims	Identity, financial	Finance	Current year plus 6 years	Legal
6.3	Sales Invoice	Identity, financial	Finance	Current year plus 6 years	Legal
6.4	Accommodation and Tuition Fee Schedules	Identity, financial	Finance	Current year plus 6 years	Legal
6.5	Source documents for salaries, tax codes, overtime, sick and maternity pay, redundancy, appointments, resignations etc	Identity, financial, contact	Finance	Durations of employment plus 6 years	Legal
6.6	Pay claim forms	Identity, financial	Finance	Current year plus 6 years	Operational
6.7	Income Tax Earning Record (P60s)	Identity, financial	Finance	Current year plus 6 years	Legal
6.8	Pension records	Identity, financial, contact	Finance	12 years; after the date of retirement or age 66 whichever is later	Legal
6.9	Insurance claims.	Identity	Finance	Current year plus 6 years	Legal

## PART B – POLICIES AND OTHER RECORDS WHICH DO NOT GENERALLY CONTAIN PERSONAL DATA

These records consist of strategic planning documents, policy/procedural documents and other records which do not generally contain personal data.

Item	Purpose	Category of data	Data owned by (department/s)	Retention period	Reason for retention (operational, regulatory, legal)
<b>1</b>	<b>STRATEGIC/PLANNING</b>				
1.1	Academy's Strategic Plan including Mission Statement	Strategic	SMT	Superseded plus 5 years	Operational
1.2	Risk Management Strategy and Risk Register	Strategic	SMT	Superseded plus 5 years	Operational
1.3	Educational Strategy	Strategic	SMT	Superseded plus 10 years	Operational
1.4	Research Strategy	Strategic	Research Office	Superseded plus 5 years	Operational
1.5	Research Events: Student (PhD) lead Public Research Event	Planning documentation	Research Office Academic Secretariat	10 years Research Office 5 years Academic Secretariat	Operational
1.6	Access and Participation Plan	Strategic	Registry SMT	10 years	Operational
1.7	Belonging Annual Report	Monitoring documentation	Belonging Committee	Superseded plus 5 years	Operational
1.8	Finance Strategy	Strategic	Finance	Superseded plus 5 years	Operational
1.9	KPI documents	Financial	Finance	Current, plus 6 years	Operational
1.10	Human Resources Strategy	Strategic	HR	Superseded plus 5 years	Operational
1.11	Information Technology Strategy	Strategic	ICT	Superseded plus 5 years	Operational



1.12	Estates Strategy	Strategic	Estates	Superseded plus 10 years	Operational
1.13	Museum Forward Plan	Strategic	Museum and Collections	Current, with archive policy retained in perpetuity	Operational
1.14	Action Plan	Planning	Museum and Collections	Current, superseded every 3 years, with archive policy retained for 15 years.	Operational
1.15	Collections Information Plan	Planning documentation	Museums and Collections	Current, with archive policy retained in perpetuity.	Operational
1.16	Emergency plan	Planning documentation	Museums and Collections	15 years	Operational
1.17	Learning and Access Plan and Policy	Planning documentation	Museums and Collections	Policy no longer exists, but archive policy retained in perpetuity.	Operational
1.18	Fundraising Strategy and related meeting agendas, minutes etc	Strategic/Planning	Philanthropy	Retained in perpetuity.	Operational
1.19	Diversity, Equity, Inclusion and Belonging Scheme and Action Plan	Strategic/Planning	Belonging Committee	Superseded plus 5 years	Operational
1.20	ESG Strategy	Strategic	ESG Committee	Superseded plus 5 years	Operational

2 ACADEMIC INFORMATION					
2.1	Programme approval submission documentation	Programme information	Academic Secretariat Heads of UG and PG Programmes	Life of programme plus 10 years	Regulatory
2.2	Programme specifications	Programme information	Academic Secretariat Heads of UG and PG Programmes	Superseded plus 10 years	Regulatory

2.3	Annual monitoring reports	Programme information	Academic Secretariat Heads of UG and PG Programmes	10 years	Operational
2.4	Periodic Programme Review documentation	Programme information	Academic Secretariat Heads of UG and PG Programmes	Life of programme plus 10 years	Regulatory
2.5	Modification to programme forms	Programme information	Academic Secretariat	Life of Programme, plus 10 years	Operational
2.6	Student feedback; anonymous feedback forms and raw data	Programme information	Academic Secretariat	7 years	Operational
2.7	BMus/BMus Jazz Programme handbooks	Programme information	Academic Secretariat	10 years with archive copies retained by Library in perpetuity.	Operational/ archive/historical
2.8	Postgraduate Programme Handbooks	Programme information	Academic Secretariat	10 years with archive copies retained by Library in perpetuity.	Operational /archive/historical
2.9	Research Degrees Code of Practice	Code of Practice	Academic Secretariat	10 years	Operational
2.10	Departmental handbooks	Programme information	Principal Study Departments	10 years	Operational
2.11	LRAM handbook/journal	Programme information	Director of LRAM	8 years	Operational
2.12	Junior Academy handbook	Programme information	Junior Academy	Current	Operational
2.13	Junior Academy staff handbook	Programme information	Junior Academy	Current	Operational
2.14	Junior Academy calendar and on show booklet	Publication	Junior Academy	In perpetuity	Archive/historical
2.15	Junior Academy Newsletter	Publication	Junior Academy	In perpetuity	Archive/historical

### 3 POLICIES

3.1	Academic Appeals Procedure	Procedural	Academic Secretariat	See Regulations (7 years)	Regulatory
3.2	Quality Assurance Procedures	Procedural	Academic Secretariat	Superseded plus 5 years	Regulatory

3.3	Student Complaints Code	Policy	Academic Secretariat	As per Academy Regulations	Regulatory
3.4	Student Disciplinary Code	Policy	Academic Secretariat	As per Academy Regulations	Regulatory
3.5	Records Management Policy	Policy	Academic Secretariat	Current	Operational
3.6	Data Retention Policy	Policy	Academic Secretariat	Current. plus, archive of previous issue	Legal
3.7	IP Policy	Policy	Academic Secretariat	In perpetuity aligned to UK legislation	Legal
3.8	FOIA Procedure	Procedural	Academic Secretariat	Current	Operational
3.9	Environmental Policy	Policy	Estates	Current	Regulatory
3.10	HR Policies and Procedures: <ul style="list-style-type: none"> <li>• Adoption Leave</li> <li>• Conferment of Academic Titles</li> <li>• Conflicts of Interests</li> <li>• Continuous Feedback</li> <li>• Data Protection</li> <li>• Dignity at Work</li> <li>• Discipline and Appeal</li> <li>• Drugs and Alcohol</li> <li>• Equal Pay</li> <li>• Equality, Diversity, and Inclusion</li> <li>• Ethics and Conduct</li> <li>• Financial Procedures</li> <li>• Flexible Working</li> <li>• General and Special Leave</li> <li>• Grievance</li> <li>• Hybrid Working</li> <li>• ICT Network</li> <li>• IT Security</li> <li>• Induction</li> </ul>	Policy/Procedural	HR	Superseded plus 5 years, with specific policies being retained for a longer period as required.	Legal Regulatory Operational

	<ul style="list-style-type: none"> <li>• Leavers</li> <li>• Managing Poor Performance</li> <li>• Managing Stress at Work</li> <li>• Maternity, Paternity and Parental Leave (inc. Neo-Natal)</li> <li>• Medical Reports</li> <li>• Menopause</li> <li>• Overtime</li> <li>• Pay</li> <li>• Probation</li> <li>• Recruitment and Selection</li> <li>• Redundancy</li> <li>• REF; Code of Practice</li> <li>• Right to be Accompanied</li> <li>• Sickness Absence</li> <li>• Sickness Absence Management</li> <li>• Safeguarding</li> <li>• Smart Working</li> <li>• Social Media</li> <li>• Staffing Contractual Variation</li> <li>• Supporting Staff Experiencing Domestic Abuse</li> <li>• Teaching Off Site</li> <li>• Training and Development</li> <li>• Whistleblowing</li> <li>• Working from Home</li> </ul>				
3.11	IT, Internet and Email Policy	Policy	ICT	Current	Operational
3.12	APL Policy	Policy	Registry	Superseded plus 5 years	Operational
3.13	Admissions Policy	Policy	Registry	Superseded plus 5 years	Operational
3.14	Exam Procedures	Procedural	Registry	7 years	Operational

3.15	Students Over 18 Safeguarding Policy	Policy	Dean of Students	Superseded plus 5 years	Operational
3.16	Students Under 18 Safeguarding Policy	Policy	Dean of Students	Superseded plus 5 years	Operational
3.17	Collections Care and Conservation Policy	Planning documentation	Museum and Collections	Current, with archive policy retained in perpetuity.	Regulatory
3.18	Collections information Policy	Planning documentation	Museum and Collections	Current, with archive policy retained in perpetuity.	Regulatory
3.19	Collections Development Policy	Planning documentation	Museum and Collections	Current, with archive policy retained in perpetuity.	Operational Regulatory Legal
3.20	Museum Access Policy	Planning documentation	Museum and Collections	Current, with archive policy retained in perpetuity.	Operational
3.21	Security Policy	Policy	Estates	Until Superseded	Operational
3.22	CCTV Policy	Policy	Estates	Until Superseded	Operational
3.23	Open Access Policy	Policy	Research Office	Current, with archive policy retained in perpetuity	Operational
3.24	AI Policy	Policy	SMT	Superseded plus 5 years	Operational

4 AUDITS/QUALITY ASSURANCE/COMPLIANCE					
4.1	OFS/QAA Reports	Audit documentation	Academic Secretariat	10 years	Regulatory
4.2	Academic Committees Audit	Audit documentation	Academic Secretariat	10 years	Operational
4.3	Equality Impact Assessments	Compliance	Academic Secretariat	5 years, or until superseded	Legal
4.4	AQAC Reports	Reporting	Academic Secretariat	Submission of report plus 3 years	Regulatory
4.5	FOIA Publication Scheme	Compliance	Academic Secretariat	Current	Legal
4.6	ROPA review action tracker	Compliance	Academic Secretariat	5 years	Operational

4.7	Waste certificates	Compliance	Estates	Removal of waste consignment plus 3 years	Legal
4.8	Display energy certificates	Compliance	Estates	Current	Legal
4.9	Fire log book	Compliance	Estates	7 years	Legal
4.10	Engineering reports (including lifts)	Compliance	Estates	For life of equipment	Legal
4.11	Electrical testing	Compliance	Estates	For life of equipment	Legal
4.12	Personal protective equipment register	Compliance	Estates	7 years where there was an accident where PPE was being used, otherwise until superseded.	Legal
4.13	Risk assessments	Compliance	Estates	7 Years where there was an accident in the area assessed, otherwise until superseded.	Legal
4.14	Financial Procedures	Compliance	Finance	Current	Legal
4.15	Postal records	Compliance	Registry	2 years	Operational
4.16	ICT software licences and certificates	Compliance	ICT	Current	Regulatory
4.17	Security Risk Assessment	Compliance	Estates	Current, with archive policy retained for 5 years	Operational

5 GOVERNANCE					
5.1	Supplemental Royal Charter and Byelaws (1998)	Formal documentation	SMT	In perpetuity	Legal
5.2	TDAP Applications 2006 and 2011	Formal documentation	Academic Secretariat	In perpetuity	Regulatory
5.3	Regulations	Formal documentation	Academic Secretariat	7 years	Regulatory

5.4	Formal committees	Committee documentation including minutes	Academic Secretariat	Life of committee plus 5 years, or 10 years in total; whichever is the greater.	Operational
5.5	Formal Committees	Governing Body Committee documentation including minutes	Secretary to Governing Body	In perpetuity	Legal Operational
5.6	Student Charter	Formal documentation	Academic Secretariat	10 years	Regulatory
5.7	Student Union Constitution	Formal documentation	Student Union	Current	Regulatory
5.8	Charitable status and accreditation	Formal documentation	Museum and Collections	In perpetuity	Regulatory
5.9	Financial Regulations	Formal documentation	Finance	Current	Legal
5.10	Supplier's Delivery Notes	Financial information	Individual department	2 years	Operational
5.11	BACS/Credit Transfer Listings	Financial information	Finance	6 years	Operational
5.12	Letters relating to stopped cheques	Financial information	Finance	6 years	Legal
5.13	Invitation to Tender/s and Tender evaluation	Financial information	Individual departments	6 years	Legal
5.14	Till Rolls	Financial information	Individual departments	6 years	Legal
5.15	Remittance advices	Financial information	Individual departments	6 years	Legal
5.16	Copy official receipts	Financial information	Individual departments	6 years	Legal
5.17	Bank Statements	Financial information	Finance	10 years	Legal
5.18	Bank Reconciliations	Financial information	Finance	6 years	Legal
5.19	Payroll & Costing Analysis	Financial information	Finance	12 years	Legal
5.20	BACS reports	Financial information	Finance	12 years	Operational
5.21	Research contracts	Financial information	Finance	6 years; after the date of termination	Operational

5.22	Research Grant Claims & Sales Invoices	Financial information	Finance	6 years	Legal
5.23	Corporation Tax & Charity Return, including working papers	Financial information	Finance	6 years	Legal
5.24	VAT Returns including working papers	Financial information	Finance	6 years	Legal
5.25	Audited Accounts (signed)	Financial information	Finance Secretary to Governing Body	In perpetuity	Operational
5.26	Annual Accounts working papers	Financial information	Finance	6 years	Operational
5.27	Annual Budget Report	Financial information	Finance	6 years	Operational
5.28	Management Accounts	Financial information	Finance	3 years	Operational
5.29	HESA Returns	Financial information	Finance	6 years	Operational
5.30	Financial Forecasts	Financial information	Finance	3 years	Operational
5.31	Insurance policies	Financial information	Finance	6 years; from the date of termination of policy	Legal
5.32	Employers' and Public Liability policies	Financial information	Finance	In perpetuity	Operational
5.33	Risk Management and other reports	Financial information	Finance	6 years	Operational
5.34	Contract Documents; Under Seal	Financial information	Individual departments	12 years	Operational
5.35	Contract Documents; Other	Financial information	Individual departments	6 years	Operational
5.36	Title deeds to property	Financial information	Estates Secretary to Governing Body	In perpetuity	Legal

6 PERFORMANCE AND EVENTS					
6.1	Concert programmes	Artistic Planning	Performance	In perpetuity	Operational
6.2	Venue contracts	Artistic Planning	Performance	15 years	Regulatory



6.3	Budget spreadsheets	Artistic Planning	Performance	7 years	Operational
6.4	Record of external recital series	Artistic Planning	Performance	7 years	Operational
6.5	PRS declarations	Artistic Planning	Performance	7 years	Legal

## 7 COMMUNICATIONS

7.1	Diary of Events	Publications	Advancement	In perpetuity	Archive/historical
7.2	Press releases	Communications	Advancement	In perpetuity	Operational
7.3	Highlights Brochure	Publications	Advancement	Operational	Operational
7.4	Academy Guide (Prospectus)	Publications	Advancement	Operational	Operational

## 8 MUSEUM & COLLECTIONS

8.1	Visitor statistics and annual survey	Planning	Museum and Collections	5 years	Operational
8.2	Educational visits	Planning	Museum and Collections	5 years	Operational
8.3	Exhibition/event administration	Planning	Museum and Collections	In perpetuity	Operational
8.4	Insurance details for collections including appraisal	Financial	Museum and Collections	In perpetuity	Regulatory
8.5	Temporary exhibition loans insurance	Financial	Museum and Collections	15 years	Regulatory
8.6	Temporary loans for playing - insurance	Financial Planning Historical record	Museum and Collections	5 years	Regulatory
8.7	Museum publications	Publications	Museum and Collections	In perpetuity	Archive/historical
8.8	Recruitment of gallery assistants and interns	Planning	Museum and Collections	1 year after end of engagement	Operational

## 9 CORPORATE MANAGEMENT

9.1	Job description and advertisement	Recruitment and Selection	HR	Current	Regulatory
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9.2	Senior management authority to recruit	Recruitment and Selection	HR	Current	Operational
9.3	Conflict of Interests Policy	Policy	SMT	Current	Operational