

1. Learner details				
Description	Retention Period	Justification	Action	Comment
Electronic copies of personal (confidential) learner data provided by schools in the form of cohort lists	End of HH programme 1 year	This allows us to accurately match students to activities they have taken part in throughout the course of the programme, which is required as part of our funding, and provides accuracies in spelling and personal details to our own records collected from students themselves. Cohort lists are stored on University owned restricted access drives, in encrypted files.	Erasure of cohort lists	Schools work within their own data protection policies to provide this data - it is not made compulsory as a requirement of receiving HH activities
Paper copies of personal (confidential) learner data provided by learners through completion of HH evaluation forms	Four weeks from date of being input into electronic system (within 8 weeks receiving the form)	During busy periods, it may take up to four weeks for data received on paper forms to be input into electronic systems. Once it has been processed, we retain paper copies for four weeks to allow us to check for inputting errors when we run monthly activity reporting. All paper copies of data collection forms are stored securely in locked cupboards, both before and after having been processed.	Paperwork shredded, and shredded material dealt with in line with confidential waste policy	All evaluation forms used contain GDPR compliant data protection and sharing statement. Learners have the option to omit personal (confidential) data if they choose to
Paper copies of personal (confidential) learner data provided by learners through completion of HH evaluation forms received during Covid-19 lockdown period	Four weeks from date of return to office. Normal period of retention will be extended due to unprecedented circumstances.	During this period, data will be processed outside of the normal retention schedule. Data will be held securely in different locations across the network during this period, and will be processed at different times. Data will be retained for four weeks after the date that both the data has been processed, and paperwork has been returned to our central office.	Paperwork shredded, and shredded material dealt with in line with confidential waste policy	All evaluation forms used contain GDPR compliant data protection and sharing statement. Learners have the option to omit personal (confidential) data if they choose to
Electronic copies of personal (confidential) learner data provided by	End of HH programme 1 year	This allows us to accurately match students to activities they have taken part in throughout the course of the programme, which is required as part of our funding.	Erasure of evaluation surveys	Learners can ask for their details for be deleted sooner than the retention

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learners through completion of HH evaluation forms (Stored in Survey Gizmo, MS Excel exports, master register)		Data is stored in Survey Gizmo (password protected, access restricted), Excel exports (encrypted and saved to secure access restricted University owned drives), and Master Register document (University owned Google Drive with limited access).		period by emailing ncop@keele.ac.uk
Paper copies of personal (confidential) learner data provided by schools in the form of activity registers	End of HH programme 1 year	This allows us to accurately match students to activities they have taken part in throughout the course of the programme, which is required as part of our funding, and provides accuracies in spelling and personal details to our own records collected from students themselves. All paper copies of data collection forms are stored securely in locked cupboards, both before and after having been processed.	Paperwork shredded and shredded material dealt with in line with confidential waste policy	Schools work within their own data protection policies to provide this data - it is not made compulsory as a requirement of receiving HH activities
Electronic copies of personal (confidential) learner data provided by schools in the form of activity registers	End of HH programme 1 year	This allows us to accurately match students to activities they have taken part in throughout the course of the programme, which is required as part of our funding, and provides accuracies in spelling and personal details to our own records collected from students themselves. Registers are stored on University owned restricted access drives, in encrypted files.	Erasure of registers	Schools work within their own data protection policies to provide this data - it is not made compulsory as a requirement of receiving HH activities
Electronic copies of personal (confidential) learner data provided by Local Authority (Stoke-on-Trent) in the form of cohort lists	End of HH programme 1 year	This allows us to accurately match students to activities they have taken part in throughout the course of the programme, which is required as part of our funding. Data provided by Local Authority provides a third point of reference for us to use for accuracy and data matching purposes. Cohort lists are stored on University owned restricted access drives, in encrypted files.	Erasure of cohort lists	Schools agreed in 2017 for this data to be shared with us by the Local Authority
Paper copies of EMWPREP forms, containing sensitive	End of HH programme 1 year	This is in line with the EMWPREP records retention policy, with which we are contractually agreed to comply.	Paperwork shredded and shredded material	Learners can contact EMWPREP directly to ask that their records are

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personal learner data provided by learners (aged over 16)			dealt with in line with confidential waste policy	removed
Electronic copies of EMWPREP forms, containing sensitive personal learner data provided by learners (aged over 16), stored in EMWPREP database	Identifiable records will be held until a full HESA data match has occurred (at age 22 of subject) Anonymised records will be held indefinitely	This is in line with the EMWPREP records retention policy, with which we are contractually agreed to comply.	Anonymise records in line with EMWPREP records retention policy	Learners can contact EMWPREP directly to ask that their records are removed
Paper copies of EMWPREP forms, containing sensitive personal learner data provided by parents (for learners aged below 16)	End of HH programme 1 year	This is in line with the EMWPREP records retention policy, with which we are contractually agreed to comply.	Paperwork shredded and shredded material dealt with in line with confidential waste policy	Learners can contact EMWPREP directly to ask that their records are removed
Electronic copies of EMWPREP forms, containing sensitive personal learner data provided by parents (for learners aged below 16), stored in EMWPREP database	Identifiable records will be held until a full HESA data match has occurred (at age 22 of subject). Anonymised records will be held indefinitely.	This is in line with the EMWPREP records retention policy, with which we are contractually agreed to comply.	Anonymise records in line with EMWPREP records retention policy	Learners can contact EMWPREP directly to ask that their records are removed
Paper copies of data collection forms (CFE surveys) containing sensitive personal learner data, provided by learners	Four weeks from date of being input into electronic system (within 8 weeks receiving	Requirement of our funding - CFE are the national evaluators of NCOP. During busy periods, it may take up to four weeks for data received via paper forms to be input into electronic systems.	Paperwork shredded and shredded material dealt with in line with confidential	All CFE surveys used contain GDPR compliant data protection and sharing statement. Learners have the option

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	the form)	<p>Once it has been processed, we retain paper copies for four weeks to allow us to check for inputting errors when we run monthly activity reporting.</p> <p>All paper copies of data collection forms are stored securely in locked cupboards both before and after having been processed.</p>	waste policy	to omit personal (confidential) data if they choose to.
Electronic file containing names and schools of learners who 'opt out' of providing consent to be added to the EMWPREP database	End of HH programme 1 year	<p>This data is only retained to ensure we do not ask for consent again once the learner or their parent has opted out and asked not to be contacted in the future. The purpose of keeping this data is to reduce risk to the data subject, and is logged against data already provided from other sources such as evaluation forms, registers and cohort lists</p> <p>Names are stored in an encrypted file on University owned access restricted drives, and against their record on the Master Register document stored in Keele University owned Google Drive.</p>	Erasure of record of 'opt out' data subjects document	Confirmed with EMWPREP that risk of future contact with data subject (who has opted out of this) is reduced by keeping a record of who has opted out
Electronic copies of data collection forms (CFE surveys) containing sensitive personal learner data, provided by learners	End of HH programme 1 year	<p>Requirement of our funding - CFE are the national evaluators of NCOP. We keep a record of all data we collect for them for accuracy and data auditing purposes.</p> <p>Electronic copies are stored in Survey Gizmo (password protected, access restricted) and on University owned secure restricted access drives.</p>	Erasure of CFE survey responses	Learners can contact ncop@keele.ac.uk to ask for their details to be removed
Personal (confidential) and sensitive personal learner data provided by learners on application forms for Residential events - received through Survey Gizmo (electronic link), and stored locally	End of HH programme 1 year	<p>This allows us to accurately match students to activities they have taken part in throughout the course of the programme, which is required as part of our funding. We also require a level of data that allows us to decide on the eligibility of a learner to attend the event, based on our funding restrictions and caveats.</p> <p>Electronic copies of Residential application data is stored on Survey Gizmo (password protected, restricted access), and University owned restricted access drives in encrypted files.</p>	Erasure of application forms	

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<p>Paper copies of application forms for residential events, containing personal (confidential) and sensitive personal learner data, provided by learners</p>	<p>Four weeks from date of being input into electronic system (within 8 weeks receiving the form)</p>	<p>During busy periods, it may take up to four weeks for data received via paper forms to be input into electronic systems. Once it has been processed, we retain paper copies for four weeks to allow us to check for inputting errors when we run monthly activity reporting.</p> <p>All paper copies of data collection forms are stored securely in locked cupboards both before and after having been processed.</p>	<p>Paperwork shredded and shredded material dealt with in line with confidential waste policy</p>	
<p>Paper copies of successful applicant documentation, containing personal (confidential) and sensitive learner data, provided by parents (if learner is under 18)</p>	<p>One year</p>	<p>We retain this information for the full year cycle, allowing it to be used to support any reporting and best practice sharing (anonymously).</p> <p>It is securely disposed of to make way for the following year's documentation from new successful applicants.</p>	<p>Paperwork shredded and shredded material dealt with in line with confidential waste policy</p>	<p>Required for safeguarding purposes</p>
<p>Electronic copies of successful applicant documentation, containing personal (confidential) and sensitive learner data, provided by parents (if learner is under 18)</p>	<p>End of HH programme 1 year</p>	<p>This allows us to accurately match students to activities they have taken part in throughout the course of the programme, which is required as part of our funding.</p> <p>Electronic copies of successful applicant data is stored on University owned restricted access drives in encrypted files.</p>	<p>Erasure of successful applicant data</p>	<p>Required for safeguarding purposes</p>
<p>Paper copies of successful applicant documentation, containing personal (confidential) and sensitive learner data, provided by learners (if aged 18)</p>	<p>One year</p>	<p>We retain this information for the full year cycle, allowing it to be used to support any reporting and best practice sharing (anonymously).</p> <p>It is securely disposed of to make way for the following year's documentation from new successful applicants.</p>	<p>Paperwork shredded and shredded material dealt with in line with confidential waste policy.</p>	<p>Required for safeguarding purposes</p>
<p>Electronic copies of successful applicant documentation, containing personal (confidential)</p>	<p>End of HH programme 1 year</p>	<p>This allows us to accurately match students to activities they have taken part in throughout the course of the programme, which is required as part of our funding.</p>	<p>Erasure of successful applicant data</p>	<p>Required for safeguarding purposes</p>

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and sensitive learner data, provided by learners (if aged 18)		Electronic copies of successful applicant data is stored on University owned restricted access drives in encrypted files.		
Personal (confidential) and sensitive data received via email from learners to team inboxes	End of HH programme 1 year	Retaining this data until the end of the programme 1 year means that we are able to go back to any emails as required at a later date to confirm details, and to act as a written record of correspondence in case of audit or issue. It may also be required for safeguarding purposes.	Deletion of email account by host institution when programme comes to an end	
Personal (confidential) and sensitive data received via email from teachers to shared team inboxes	End of HH programme 1 year	Retaining this data until the end of the programme 1 year means that we are able to go back to any emails as required at a later date to confirm details, and to act as a written record of correspondence in case of audit or issue. It may also be required for safeguarding purposes.	Deletion of email account by host institution when programme comes to an end	
Personal (confidential) and sensitive data received via email from teachers to individual work inboxes	End of HH programme 1 year	Retaining this data until the end of the programme 1 year means that we are able to go back to any emails as required at a later date to confirm details, and to act as a written record of correspondence in case of audit or issue. It may also be required for safeguarding purposes.	Deletion of email account by host institution when programme comes to an end	
Paper copies of media consent forms collected for high intensity activities, containing personal learner data	End of HH programme 1 year	<p>To allow us to take photographs and videos on our high intensity activities, we ask learners (or learners' parents for under 16s) to complete a media consent form. Consent can be withdrawn at any time.</p> <p>Consent is not transferrable between events - learners are asked to complete a new consent form for each high intensity event they attend.</p> <p>All paper copies of media consent forms are stored securely in locked cupboards both before and after having been processed.</p>	Paperwork shredded and shredded material dealt with in line with confidential waste policy	Learners can withdraw their consent at any time using details provided when signing the form.

Photographs taken on any HH events and activities	End of HH programme 1 year	Photographs are taken with consent of learners/parents as appropriate. Retention of these photographs will allow us to use them for promotional purposes throughout the life of the NCOP programme.	Deletion of all photographs when programme comes to an end	Learners can decide not to consent for their photographs to be used
Video footage taken on any HH events and activities	End of HH programme 1 year	Videos are taken with consent of learners/parents as appropriate. Retention of these videos will allow us to use them for promotional purposes throughout the life of the NCOP programme.	Deletion of all video footage when programme comes to an end	Learners can decide not to consent for their photographs to be used

2. Teachers and advisors details				
Description	Retention Period	Justification	Action	Comments
Paper copies of personal (confidential) teacher data provided by teachers through completion of HH evaluation forms	Four weeks from date of being input into electronic system (within 8 weeks receiving the form)	<p>During busy periods, it may take up to four weeks for data received via paper forms to be input into electronic systems. Once it has been processed, we retain paper copies for four weeks to allow us to check for inputting errors when we run monthly activity reporting.</p> <p>All paper copies of data collection forms are stored securely in locked cupboards both before and after having been processed.</p>	Paperwork shredded and shredded material dealt with in line with confidential waste policy	All evaluation forms used contain GDPR compliant data protection and sharing statement. Teachers and advisors have the option to omit personal (confidential) data if they choose to

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Electronic copies of personal (confidential) teacher data provided by teachers through completion of HH evaluation forms (Stored in Survey Gizmo, MS Excel exports, master register)	End of HH programme 1 year	This allows us to gauge the effectiveness of our activities by tracking the comments and feedback left by teachers and advisors throughout the year. Data is stored in Survey Gizmo (password protected, access restricted), Excel exports (encrypted and saved to secure access restricted University owned drives) and Master Register document (University owned Google Drive with limited access).	Erasure of evaluation surveys	Teachers and advisors can ask for their details for be deleted sooner than the retention period by emailing ncop@keele.ac.uk
Email enquiries containing personal (confidential) data received from teachers or advisors to team inboxes	End of HH programme 1 year	Retaining this data until the end of the programme 1 year means that we are able to go back to any emails as required at a later date to confirm details, and to act as a written record of correspondence in case of audit or issue.	Deletion of email account by host institution when programme comes to an end	
Paper copies of media consent forms collected for high intensity activities, containing personal teacher data	End of HH programme 1 year	To allow us to take photographs and videos on our high intensity activities, we ask teachers to complete a media consent form. Consent can be withdrawn at any time. Consent is not transferrable between events - teachers are asked to complete a new consent form for each high intensity event they attend. All paper copies of media consent forms are stored securely in locked cupboards both before and after having been processed.	Paperwork shredded and shredded material dealt with in line with confidential waste policy	Teachers can withdraw their consent at any time using details provided when signing the form.
Photographs taken on any HH events and activities	End of HH programme 1 year	Photographs are taken with consent as appropriate. Retention of these photographs will allow us to use them for promotional purposes throughout the life of the NCOP programme.	Deletion of all photographs when programme comes to an end	Teachers can decide not to consent for their photographs to be used
Video footage taken on any HH events and activities	End of HH programme 1 year	Videos are taken with consent as appropriate. Retention of these videos will allow us to use them for promotional purposes throughout the life of the NCOP programme.	Deletion of all video footage when	Teachers can decide not to consent for their photographs to be used

			programme comes to an end	
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3. Parents and carers details				
Description	Retention Period	Justification	Action	Comments
Paper copies of personal (confidential) parents data provided by parents through completion of HH evaluation forms	Four weeks from date of being input into electronic system (within 8 weeks receiving the form)	<p>During busy periods, it may take up to four weeks for data received via paper forms to be input into electronic systems. Once it has been processed, we retain paper copies for four weeks to allow us to check for inputting errors when we run monthly activity reporting.</p> <p>All paper copies of data collection forms are stored securely in locked cupboards both before and after having been processed.</p>	Paperwork shredded and shredded material dealt with in line with confidential waste policy	All evaluation forms used contain GDPR compliant data protection and sharing statement. Parents and carers have the option to omit personal (confidential) data if they choose to
Electronic copies of personal (confidential) parents data provided by parents through completion of HH evaluation forms	End of HH programme 1 year	<p>This allows us to gauge the effectiveness of our activities by tracking the comments and feedback left by parents and carers throughout the year.</p> <p>Data is stored in Survey Gizmo (password protected,</p>	Erasure of evaluation surveys	Parents and carers can ask for their details for be deleted sooner than the retention period by emailing

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(Stored in Survey Gizmo, MS Excel exports, master register)		access restricted), Excel exports (encrypted and saved to secure access restricted University owned drives) and Master Register document (University owned Google Drive with limited access).		ncop@keele.ac.uk
Paper copies of EMWPREP forms, containing personal (confidential) parents data (name, relationship to child) provided by parents	End of HH programme 1 year	This is in line with the EMWPREP records retention policy, with which we are contractually agreed to comply	Paperwork shredded and shredded material dealt with in line with confidential waste policy	Parents do not have to complete the EMWPREP form if they do not want their data used or stored
Electronic copies of EMWPREP forms, containing personal (confidential) data provided by parents, stored in EMWPREP database	Identifiable records will be held until a full HESA data match has occurred (at age 22 of subject). Anonymised records will be held indefinitely.	This is in line with the EMWPREP records retention policy, with which we are contractually agreed to comply.	Anonymise records in line with EMWPREP records retention policy	Parents do not have to complete the EMWPREP form if they do not want their data used or stored
Parental consent (signature) given on documents circulated to successful applicants to residential activities; including emergency contact details for their child - paper form copies and electronic copies	End of residential project 4 weeks	This is required for safeguarding purposes. Retaining the data for four weeks after the end of the project allows us to deal with any queries from parents or schools, or as evidence if any issues arising must be investigated after the event.	Paperwork shredded and shredded material dealt with in line with confidential waste policy. Erasure of electronic files containing this data	Details required for safeguarding purposes. If not provided, learner will not be allowed to attend event
Paper copies of media consent forms collected for high intensity activities,	End of HH programme 1 year	To allow us to take photographs and videos on our high intensity activities, we ask parents to complete a media consent form. Consent can be withdrawn at any time.	Paperwork shredded and shredded	Parents can withdraw their consent at any time using details provided when

containing personal parent data		<p>Consent is not transferrable between events - parents are asked to complete a new consent form for each high intensity event they attend.</p> <p>All paper copies of media consent forms are stored securely in locked cupboards both before and after having been processed.</p>	material dealt with in line with confidential waste policy	signing the form.
Photographs taken on any HH events and activities	End of HH programme 1 year	Photographs are taken with consent as appropriate. Retention of these photographs will allow us to use them for promotional purposes throughout the life of the NCOP programme.	Deletion of all photographs when programme comes to an end	Parents can decide not to consent for their photographs to be used
Video footage taken on any HH events and activities	End of HH programme 1 year	Videos are taken with consent as appropriate. Retention of these videos will allow us to use them for promotional purposes throughout the life of the NCOP programme.	Deletion of all video footage when programme comes to an end	Parents can decide not to consent for their photographs to be used

4. Current students details				
Description	Retention Period	Justification	Action	Comments
Electronic copies of personal (confidential) current students' data provided by current students through	End of HH programme 1 year	This allows us to assess applications as they are received. We keep notes alongside application details pertaining to the success of an application. Retaining the data for this period allows us to deal with any queries from current	Erasure of electronic files containing this data	

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application form to become HH Ambassador (Submitted via Google Form, stored in Google Sheet, MS Excel sheets)		students or their institutions, or as evidence if any issues arising must be investigated after the event.		
Emails containing names of successful and unsuccessful applicants to the Student Ambassador team at the institution they hold a contract with, sent and received through team or individual inboxes	End of HH programme 1 year	Retaining this data until the end of the programme 1 year means that we are able to go back to any emails as required at a later date to confirm details, and to act as a written record of correspondence in case of audit or issue.	Deletion of email account by host institution when programme comes to an end	
Email enquiries containing personal (confidential) data received from current students to team or individual inboxes	End of HH programme 1 year	Retaining this data until the end of the programme 1 year means that we are able to go back to any emails as required at a later date to confirm details, and to act as a written record of correspondence in case of audit or issue.	Deletion of email account by host institution when programme comes to an end	