

1. Learner details				
Description	Retention Period	Justification	Action	Comment
Paper copies of learners' personal data, including special category data, provided by schools and colleges in the form of cohort lists and 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 a requirement of our funding. Registers are also required for auditing purposes, allowing us to prove the accuracy of our reporting to our funders. All paper copies of cohort lists and registers are stored securely in locked cupboards within access-restricted buildings, both before and after having been processed.	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	Schools and colleges are asked to provide this data where an appropriate Data Sharing Agreement is in place, as a requirement of receiving HH activities.
Electronic copies of learners' personal data, including special category data, provided by schools and colleges in the form of cohort lists and 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 a requirement of our funding. Registers are also required for auditing purposes, allowing us to prove the accuracy of our reporting to our funders. Cohort lists and registers are stored on institutionally owned restricted access drives, in encrypted files; and institutionally controlled cloud drives with restricted access.	Erasure of cohort lists and registers; and deletion of cloud account by host institution when programme comes to an end.	Schools and colleges are asked to provide this data where an appropriate Data Sharing Agreement is in place, as a requirement of receiving HH activities.
Paper copies of learners' personal data provided by learners through completion of HH evaluation forms.	Eight weeks from date of being input into electronic system (within twelve weeks of receiving the form).	During busy periods, it may take up to twelve 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 within access-restricted buildings, both before and after having been processed.	Paperwork shredded, and shredded material dealt with in line with confidential waste policy.	All evaluation forms contain UK GDPR compliant data protection and sharing statement. Learners have the option to omit personal data if they choose to.

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Electronic copies of learners' personal data provided by learners through completion of HH evaluation forms. (Stored in SmartSurvey account, MS Excel exports, 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. Data is stored in a HH controlled SmartSurvey account (password protected, access restricted), and Excel exports (encrypted and saved to secure access restricted institutionally owned drives, and institutionally controlled cloud drives with restricted access).	Erasure of evaluation surveys; and deletion of cloud account by host institution when programme comes to an end.	Learners can ask for their details for be deleted sooner than the retention period by emailing ncop@keele.ac.uk .
Electronic copies of learners' personal 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 institutionally owned restricted access drives, in encrypted files.	Erasure of cohort lists.	Schools within Stoke-on-Trent LA agreed in 2017 for this data to be shared with us by the Local Authority. NB. This data is now received directly via schools/colleges, see Point 1.
Paper copies of EMWPREP forms, containing learners' personal data, including special category data, provided by learners if aged over 16; and by parents/carers if aged 16 and under.	End of EMWPREP project +1 year	This is in line with the EMWPREP records retention policy, and audit policy, with which we are contractually agreed to comply. Duplicate copies of paper EMWPREP records will be confidentially destroyed before the date given, with the new copy taking place of the old.	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 learners' personal data, including special category data, provided by learners if aged over 16; and by parents if aged 16 and under.	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.

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Paper copies of data collection forms (CFE Research surveys) containing learners' personal data, including special category data, provided by learners	Four weeks from date of being input into electronic system (within 8 weeks receiving the form).	Requirement of our funding – CFE Research form part of the national evaluation of the Uni Connect Programme. 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. All paper copies of data collection forms are stored securely in locked cupboards in access-restricted buildings both before and after having been processed.	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	All CFE surveys contain UK GDPR compliant data protection and sharing statement. Learners have the option to omit personal data if they choose to. NB. This project has now closed.
Electronic copies of data collection forms (CFE Research surveys) containing learners' personal data, including special category data, provided by learners.	End of HH programme +1 year.	Requirement of our funding - CFE Research are the national evaluators of the Uni Connect Programme. We keep a record of all data we collect for them for accuracy and data auditing purposes, and to allow us to contact the same respondents year on year for the purpose of this survey. Electronic copies are stored in HH controlled Alchemer account (password protected, access restricted) and on institutionally owned secure restricted access drives.	Erasure of CFE Research survey responses.	Learners can contact ncop@keele.ac.uk to ask for their details to be removed. NB. This project has now closed.
Paper copies of application forms for residential events, or other high intensity events and programmes, containing learners' personal data, including special category data, provided by learners.	Four weeks from date of being input into electronic system (within 8 weeks of receiving the form).	During busy periods, it may take up to twelve weeks for data received via paper forms to be input into electronic systems. Once it has been processed, we retain paper copies for up to eight 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 in access-restricted buildings both before and after having been processed.	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	
Electronic copies of application forms for residential events, or other high intensity events and	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. We	Erasure of application forms.	

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programmes, containing learners' personal data, including special category data, provided by learners - received through SmartSurvey surveys, or MS Forms (electronic link), and stored locally.		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. Electronic copies of residential application data are stored on HH controlled SmartSurvey account, or MS 365 account (password protected, restricted access), or and institutionally owned restricted access drives in encrypted files.		
Paper copies of additional information forms pertaining to successful applicants to residential events, or other high intensity events and programmes, containing learners' personal data, including special category data. This is provided by parents/carers if learner is under 18; or learners themselves if aged 18 and over.	One year from the date of event.	We retain this information for the full year cycle, allowing it to be used to support any reporting and best practice sharing (anonymously). It is securely disposed of to make way for the following year's documentation from new successful applicants.	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	This data is required for health and safety safeguarding purposes.
Electronic copies of additional information forms pertaining to successful applicants to residential events, or other high intensity events and programmes, containing learners' personal data, including special category data. This is provided by parents/carers if learner is under 18; or learners themselves if aged 18 and over.	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. Electronic copies of successful applicant data are stored on institutionally owned restricted access drives in encrypted files; or institutionally controlled cloud drives with restricted access.	Erasure of successful applicant data.	This data is required for health and safety safeguarding purposes.
Learners' personal data, including special category data, received via email from learners or teachers/advisors to team or individual staff inboxes.	End of HH programme.	Retaining this data until the end of the programme allows us to return to any emails as required later 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 consent forms collected for certain activities, containing learners' personal data, including parental consent, media consent, social media consent, travel consent, attendance consent, medical administration consent, as applicable and appropriate.	End of HH programme +1 year.	To allow us to take photographs and videos at our activities, we ask learners (or learners' parents for under 16s) to complete a media consent form. Consent can be withdrawn at any time. Some activities require consent for travel to and from an event; consent to attend; and/or consent for HH staff to administer essential medication if applicable. This varies between activities and events. Consent is not transferrable between events - learners are asked to complete a new consent form for each high intensity event they attend. Consent can be withheld without restricting the learner's access to the activity. All paper copies of consent forms are stored securely in locked cupboards, in access-restricted buildings both before and after having been processed.	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. Learners and their parents (if under 16) are provided with details of HH staff to contact for withdrawal of consent.
Electronic copies of consent forms collected for certain activities, containing learners' personal data, including parental consent, media consent, social media consent, travel consent, attendance consent, medical administration consent, as applicable and appropriate.	End of HH programme +1 year.	To allow us to take photographs and videos at our activities, we ask learners (or learners' parents for under 16s) to complete a media consent form. Consent can be withdrawn at any time. Some activities require consent for travel to and from an event; consent to attend; and/or consent for HH staff to administer essential medication if applicable. This varies between activities and events. Electronic copies of consent forms are stored on institutionally owned restricted access drives in encrypted files. These are retained for safeguarding purposes.	Erasure of files containing consent.	This data is required for health and safety safeguarding purposes.
Photographs and video footage taken at any HH events and activities.	End of HH programme +1 year.	Photographs and video footage are taken with consent of learners/parents as appropriate. Retention of these photographs and footage will allow us to use them for promotional purposes throughout the life of the Uni	Deletion of all photographs and video footage when programme	Learners/parents can decide not to consent for their photographs or video footage of them

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		Connect Programme.	comes to an end.	to be used.
Paper copies of HEAT data collection forms, containing learners' personal data, including special category data, provided by learners if aged over 16; and by parents/carers if aged 16 and under.	End of HH programme +1 year	HH collects data to be added to the HEAT database using paper data collection forms. This retention period falls in line with that of our other paper-based records, allowing for accuracy, consistency and data auditing purposes. Any duplicate copies of paper HEAT data collection forms will be confidentially destroyed before the date given, with the new copy taking place of the old.	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	Learners can contact HH directly to ask that their records are removed.
Electronic records on HEAT database, from data collection forms and gathered directly from schools/colleges under a valid DSA, containing learners' personal data, including special category data, provided by learners if aged over 16; and by parents if aged 16 and under.	Where tracking permission has been sought, records will be held for 15 years after the year a learner is ready to enter Higher Education. Where tracking permission has not been sought, records will be held for 7 years of being added to the database. Once the retention period has expired, learners' information will be anonymised and they will no longer be identifiable.	This is in line with the HEAT retention policy, with which we are contractually agreed to comply. This can be found here: https://heat.ac.uk/privacy-notice/ .	Anonymise or delete records in line with HEAT retention policy.	Learners can contact HH directly to ask that their records are removed.

2. Teachers and advisors' details				
Description	Retention Period	Justification	Action	Comments
Paper copies of teachers'/advisors' personal data provided by teachers/advisors through completion of HH evaluation forms.	Eight weeks from date of being input into electronic system (within twelve weeks of receiving the form).	During busy periods, it may take up to twelve weeks for data received via paper forms to be input into electronic systems. Once it has been processed, we retain paper copies for up to eight 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 in access-restricted buildings both before and after having been processed.	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	All evaluation forms contain UK GDPR compliant data protection and sharing statement. Teachers and advisors have the option to omit personal data if they choose to.
Electronic copies of teachers'/advisors' personal data provided by teachers/advisors through completion of HH evaluation forms. (Stored in SmartSurvey account, MS Excel exports, registers).	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 HH controlled SmartSurvey account (password protected, access restricted), Excel exports (encrypted and saved to secure access restricted institutionally owned drives, and institutionally controlled cloud drives with restricted access).	Erasure of evaluation surveys; and deletion of cloud account by host institution when programme comes to an end.	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 teachers'/advisors' personal data received from teachers/advisors to team or individual staff inboxes.	End of HH programme.	Retaining this data until the end of the programme allows us to return to any emails as required later 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 certain activities, containing teachers'/advisors' personal data.	End of HH programme +1 year.	To allow us to take photographs and videos at our activities, we may ask teachers and advisors 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	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	Teachers/advisors can withdraw their consent at any time using details provided when signing the form.

		securely in locked cupboards in access-restricted buildings both before and after having been processed.		
Photographs and video footage taken on any HH events and activities.	End of HH programme +1 year.	Photographs and video footage are taken with consent as appropriate. Retention of these photographs and footage will allow us to use them for promotional purposes throughout the life of the Uni Connect Programme.	Deletion of all photographs and video footage when programme comes to an end.	Teachers/advisors can decide not to consent for their photographs and video footage to be used.

3. Parents' and carers' details				
Description	Retention Period	Justification	Action	Comments
Paper copies of parents'/carers' personal data provided by parents/carers through completion of HH evaluation forms.	Eight weeks from date of being input into electronic system (within twelve weeks of receiving the form).	During busy periods, it may take up to twelve weeks for data received via paper forms to be input into electronic systems. Once it has been processed, we retain paper copies for up to eight 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 in access-restricted buildings both before and after having been processed.	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	All evaluation forms contain UK GDPR compliant data protection and sharing statement. Parents and carers have the option to omit personal data if they choose to.
Electronic copies of parents'/carers' personal data provided by parents/carers through completion of HH evaluation forms. (Stored in SmartSurvey account, MS Excel exports, registers).	End of HH programme +1 year.	This allows us to gauge the effectiveness of our activities by tracking the comments and feedback left by parents and carers throughout the year. Data is stored in HH controlled SmartSurvey accounts (password protected, access restricted), Excel exports (encrypted and saved to secure access restricted institutionally owned drives, and institutionally controlled cloud drives with restricted access).	Erasure of evaluation surveys.	Parents and carers can ask for their details for be deleted sooner than the retention period by emailing ncop@keele.ac.uk .

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Paper and electronic copies of parental consent (signature) given on documents circulated to successful applicants to residential activities, or other high intensity activities; including emergency contact details for their child/dependent.	One year from the date of event.	This is required for safeguarding purposes. Retaining the data after the end of the project allows us to deal with any queries from parents/carers or schools and colleges, 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 certain activities, containing parents'/carers' personal data.	End of HH programme +1 year.	To allow us to take photographs and videos at our activities, we ask parents/carers to complete a media consent form. Consent can be withdrawn at any time. Consent is not transferrable between events – parents/carers 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.	Parents/carers can withdraw their consent at any time using details provided when signing the form.
Photographs and video footage taken on any HH events and activities.	End of HH programme +1 year.	Photographs and video footage are taken with consent as appropriate. Retention of these photographs and footage will allow us to use them for promotional purposes throughout the life of the Uni Connect programme.	Deletion of all photographs and video footage when programme comes to an end.	Parents/carers can decide not to consent for their photographs or video footage to be used

4. Contractual data				
Description	Retention Period	Justification	Action	Comments
Paper copies of contracts with third party providers pertaining to HH projects, events and activities.	End of HH Programme +1 year; <i>Or</i> Six years from date of signature <i>Whichever is later</i>	Some projects, events and activities require individual contracts to be signed with third parties. In these cases, contractual paperwork must be retained as appropriate, in paper form.	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	
Paper copies of University Contract Approval and Signature process paperwork (Keele University).	End of HH Programme +1 year; <i>Or</i> Six years from date of signature <i>Whichever is later</i>	Any contracts entered into by HH are subject to Keele University's University Contract Approval and Signature process, which generates its own paperwork. This paperwork must be stored alongside the contract, in paper form, in accordance with Keele University procedure and in line with their retention schedule.	Paperwork shredded and shredded material dealt with in line with confidential waste policy.	
Electronic copies of contracts with third party providers pertaining to HH projects, events and activities.	End of HH Programme +1 year; <i>Or</i> Six years from date of signature <i>Whichever is later</i>	Some projects, events and activities require individual contracts to be signed with third parties. In these cases, contractual paperwork must be retained as appropriate, in electronic form.	Erasure of electronic files containing this data.	
Electronic copies of University Contract Approval and Signature process paperwork	End of HH Programme +1 year; <i>Or</i> Six years from date of signature <i>Whichever is later</i>	Any contracts entered into by HH are subject to Keele University's University Contract Approval and Signature process, which generates its own paperwork. This paperwork must be stored alongside the contract, in electronic form, in accordance with Keele University procedure and in line with their retention schedule	Erasure of electronic files containing this data.	
Electronic copies of Data Sharing Agreements held between HH and schools and colleges	End of HH Programme +1 year	The schools and colleges we work with are asked to sign a Data Sharing Agreement to facilitate safe and legal data sharing. Electronic DSA documents are stored on institutionally owned restricted access drives in encrypted files.	Erasure of electronic files containing this data.	