

Section 1: Learner details				
Ref.	Description	Retention Period	Action	Justification and supporting notes
1.1	Learners' personal and special category data provided by schools and colleges in the form of cohort lists and registers.	Paper copies: End of academic year in which they were received, +1 year.	Paper copies: Paperwork shredded; shredded material disposed of in line with confidential waste policy.	This data allows us to accurately match students to activities they take part in, as a requirement of our funding. It is also required for auditing purposes, and to prove the accuracy of our reporting to our funders. Paper copies of cohort lists and registers provided by schools/colleges are digitised before paper copies are destroyed. 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. Electronic copies of cohort lists and registers provided by schools/colleges are stored on institutionally owned restricted access drives, in encrypted files, and institutionally controlled cloud drives with restricted access. 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: End of HH programme, +1 year.	Electronic copies: Erasure of files containing this data; deletion of cloud account by host institution when programme comes to an end.	
1.2	Learners' personal data provided directly by learners through completion of HH evaluation (feedback) forms.	Paper copies: Eight weeks from date of being input into electronic system (within twelve weeks of receipt).	Paper copies: Paperwork shredded; shredded material disposed of in line with confidential waste policy.	This data allows us to report on the impact of our activities and allows us to triangulate data received from other sources to ensure data accuracy and credibility. During busy periods, it may take up to twelve weeks for data received on paper forms to be input into electronic systems. Once processed, we retain paper copies for four weeks to allow us to check for inputting errors. All paper copies of data collection forms are stored securely in locked cupboards within access-restricted buildings, both before and after having been processed.

		Electronic copies: End of HH programme, +1 year.	Electronic copies: Erasure of files containing this data; deletion of SmartSurvey data and account, and deletion of cloud account by host institution when programme comes to an end.	Electronic 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).
1.3	Learners' personal data provided by Local Authority (Stoke-on-Trent) in the form of cohort lists. Electronic copies only.	End of HH programme, +1 year.	Erasure of these files.	Prior to personal data being provided directly by schools/colleges (see Ref. 1.1), schools within Stoke-on-Trent LA agreed for the LA to share this data with us. This took place in 2017, and no further data has been received this way, however this data has been retained for audit purposes only. Cohort lists are stored on institutionally owned restricted access drives, in encrypted files.
1.4	EMWPREP tracking data, containing learners' personal and special category data, provided directly by learners (or parents/carers if aged 16 or under).	Paper copies: End of EMWPREP project, +1 year	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	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 are confidentially destroyed before the date given, with the new copy taking place of the old.
		Electronic records: Identifiable records will be held until a full HESA data match has occurred (at age 22 of subject). Anonymised records will be held indefinitely.	Electronic copies: Anonymisation of records in line with EMWPREP records retention policy.	Electronic records previously held in the EMWPREP database were transferred to the HEAT database following the closure of the former on 30/09/2025. NB. Destruction of paper copies of EMWPREP forms will commence from 1st October 2026, which marks one year since the closure of EMWPREP.

1.5	CFE Research surveys, containing learners' personal and special category data, provided directly by learners.	Paper copies: Four weeks from date of being input into electronic system (within 8 weeks receiving the form).	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	This data was collected between 2017 and 2020 as part of the national evaluation of the Uni Connect Programme, and involvement was a requirement of our funding. NB. This project has now closed.
		Electronic copies: End of HH programme, +1 year.	Electronic copies: Erasure of files containing CFE Research survey responses.	
1.6	Learners' personal and special category data received directly from learners (or their parents/carers if aged 16 or under) through application forms for high intensity programmes, or those where learners are taken off site.	Paper copies: Four weeks from date of being input into electronic system (within 8 weeks of receiving the form).	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	This data is required to prove the eligibility of learners attending these events or programmes, based on our funding restrictions, targeting and caveats. It is also used for logistical, health and safety and safeguarding purposes. 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. All paper copies of data collection forms are stored securely in locked cupboards in access-restricted buildings both before and after having been processed. 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.
		Electronic copies: End of HH programme, +1 year.	Electronic copies: Erasure of files containing this data; deletion of cloud account by host institution when programme comes to an end.	
1.7	Learners' personal and special category data, received via email from learners or teachers/advisors to team or individual staff inboxes.	End of HH programme.	Deletion of email account by host institution when programme comes to an end.	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.

1.8	Learners' personal data received directly from learners (or their parents/carers if aged 16 or under), through consent forms for taking part in certain activities.	Paper copies: End of HH programme, +1 year.	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	Some activities require us to gather consent from learners (or their parents/carers if aged 16 or under). These include, but are not limited to, activities where we plan to take identifiable photographs or videos, activities and visits taking place off-site, residential activities, and activities that learners attend without school/college staff, or outside of normal school/college hours. Types of consent required varies between 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. These are retained for safeguarding purposes. Electronic copies of consent forms are stored on institutionally owned restricted access drives in encrypted files. These are retained for safeguarding purposes.
		Electronic copies: End of HH programme, +1 year.	Electronic copies: Erasure of files containing this data; deletion of cloud account by host institution when programme comes to an end.	
1.9	Photographs and video footage pertaining to learners, taken at HH events and activities.	End of HH programme +1 year.	Deletion of all photographs and video footage when programme comes to an end; deletion of cloud account by host institution when programme comes to an end.	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 Connect Programme. Learners/parents can decide not to consent for their photographs or video footage of them to be used.
1.10	HEAT tracking data, containing learners' personal and special category data, provided directly by learners (or parents/carers if aged 16 or under).	Paper copies: End of HH programme, +1 year; or the end of HH's agreement with HEAT, +1 year – whichever is sooner.	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	HH collects data to be added to the HEAT database using paper and electronic data collection forms. This data is collected and processed as a requirement of our funding, allowing us to accurately track which activities learners' attend, and the educational journeys of both attendees and non-attendees. These records are retained for audit purposes, to ensure accuracy and consistency of data, and in line with the HEAT retention policy,

		Electronic copies: Local copies (collected by HH through SmartSurvey system): End of HH programme, +1 year. Copies of data uploaded to the HEAT database: 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.	Electronic copies: Local copies (collected by HH through SmartSurvey system): Erasure of files containing this data; deletion of SmartSurvey data and account, and deletion of cloud account by host institution when programme comes to an end. Copies of data uploaded to the HEAT database: Anonymise or delete records in line with HEAT retention policy.	with which we are contractually obliged to comply, and which can be found here https://heat.ac.uk/privacy-notice/. 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.
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Section 2: Teachers and advisors' details				
Ref.	Description	Retention Period	Action	Justification and supporting notes
2.1	Teachers'/advisors' personal data provided directly by teachers/advisors through completion of HH evaluation (feedback) forms.	Paper copies: Eight weeks from date of being input into electronic system (within twelve weeks of receipt).	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	This data allows us to report on the impact of our activities and allows us to triangulate data received from other sources to ensure data accuracy and credibility. During busy periods, it may take up to twelve weeks for data received on paper forms to be input into electronic systems. Once processed, we retain paper copies for four weeks to allow us to check for inputting errors. All paper copies of data collection forms are stored securely in locked cupboards within access-restricted buildings, both before and after having been processed. Electronic 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).
		Electronic copies: End of HH programme, +1 year.	Electronic copies: Erasure of files containing this data; deletion of SmartSurvey data and account, and deletion of cloud account by host institution when programme comes to an end.	
2.2	Teachers'/advisors' personal and special category data, received via email from teachers/advisors to team or individual staff inboxes.	End of HH programme.	Deletion of email account by host institution when programme comes to an end.	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.

2.3	Teachers'/advisors' personal data received directly from teachers/advisors through consent forms for taking part in certain activities.	Paper copies: End of HH programme, +1 year.	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	Some activities require us to gather consent from teachers/advisors. These include, but are not limited to, activities where we plan to take identifiable photographs or videos, interviews or focus groups taking place for research or impact reporting purposes. Types of consent required varies between events. Consent is not transferrable between events – if teachers/advisors take part in more than one activity requiring consent, they will be asked to complete a new consent form for each. All paper copies of consent forms are stored securely in locked cupboards, in access-restricted buildings both before and after having been processed. These are retained for safeguarding and audit purposes. Electronic copies of consent forms are stored on institutionally owned restricted access drives in encrypted files. These are retained for safeguarding purposes.
		Electronic copies: End of HH programme, +1 year.	Electronic copies: Erasure of files containing this data; deletion of cloud account by host institution when programme comes to an end.	
2.4	Photographs and video footage pertaining to teachers/advisors, taken on at HH events and activities.	End of HH programme +1 year.	Deletion of all photographs and video footage when programme comes to an end; deletion of cloud account by host institution when programme comes to an end.	Photographs and video footage are taken with consent of teachers/advisors 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. Teachers/advisors can decide not to consent for their photographs or video footage of them to be used.

Section 3: Parents' and carers' details				
Ref.	Description	Retention Period	Action	Justification and supporting notes
3.1	Parents'/carers' personal data provided directly by parents/carers through completion of HH evaluation (feedback) forms.	Paper copies: Eight weeks from date of being input into electronic system (within twelve weeks of receipt).	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	This data allows us to report on the impact of our activities and allows us to triangulate data received from other sources to ensure data accuracy and credibility. During busy periods, it may take up to twelve weeks for data received on paper forms to be input into electronic systems. Once processed, we retain paper copies for four weeks to allow us to check for inputting errors. All paper copies of data collection forms are stored securely in locked cupboards within access-restricted buildings, both before and after having been processed. Electronic 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).
		Electronic copies: End of HH programme, +1 year.	Electronic copies: Erasure of files containing this data; deletion of SmartSurvey data and account, and deletion of cloud account by host institution when programme comes to an end.	
3.2	Parents'/carers' personal data received directly from parents/carers, through consent forms for learners taking part in certain activities; or for media consent of parents/carers.	Paper copies: End of HH programme, +1 year.	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	For activities where consent is required from parents/carers as a learner is aged 16 or under, we may collect limited data on parents/carers, including but not limited to name, relationship to the learner, email address, and phone number. Types of consent required varies between events. This data 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. All paper copies of consent forms are stored securely in locked cupboards, in access-restricted buildings both before and after having been processed. Electronic copies of consent forms are stored on institutionally owned restricted access drives in encrypted files.
		Electronic copies: End of HH programme, +1 year.	Electronic copies: Erasure of files containing this data; deletion of cloud account by host institution when programme comes to an end.	

Section 4: Contractual data				
Ref.	Description	Retention Period	Action	Justification and supporting notes
4.1	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>	Paper copies: Paperwork shredded; shredded material dealt with in line with confidential waste policy.	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 and electronic form.
			Electronic copies: Erasure of files containing this data; deletion of cloud account by host institution when programme comes to an end.	
4.2	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>	Paper copies: Paperwork shredded and shredded material dealt with in line with confidential waste policy.	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 and/or electronic form, in accordance with Keele University procedure and in line with their retention schedule.
			Electronic copies: Erasure of files containing this data; deletion of cloud account by host institution when programme comes to an end.	
4.3	Data Sharing Agreements held between HH and schools and colleges.	End of HH Programme, +1 year	Erasure of files containing this data; deletion of cloud account by host institution when programme comes to an end.	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.