

## Data Retention Schedule

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# Data Retention Schedule

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**Scope**

Trinity College London (**‘Trinity’, ‘we’, ‘us’**) establishes retention schedules for specific categories of personal data to ensure legal compliance with our data protection obligations. Some data retained by Trinity may be anonymised and may be kept indefinitely in that format. For further information, please contact the Data Protection Officer at [dpo@trinitycollege.com](mailto:dpo@trinitycollege.com).

Trinity is also an approved provider of Secure English Exam Tests (**“SELT”**) for UK Visa and Immigration (**“UKVI”**), part of the Home Office, which means we may hold and process your personal information as a processor on behalf of the Home Office. Please see table titled *‘SELT Services as per Home Office Requirements’* where the Home Office is acting as a data controller and which Trinity, as data processor, must follow. Trinity may retain records for longer periods than those prescribed by the Home Office when acting as a controller for other processing activities.

Records not set out in the table titled *‘SELT Services as per Home Office Requirements’* follow the standard retention timelines set by Trinity. Similarly, records not set out in the table titled *‘Arts Award’* follow the standard retention timelines set by Trinity.

**Change History**

The following changes and approvals have been made to this document:

Version	Date	Author	Change Summary
0.1	31.03.2026	Data Protection Officer	Refreshed schedule created

### Exam Delivery

Record Type	Retention Type/Purpose	Retention Period
Access Fund Grant applicant records	Business Need	6 years from grant being received; payment details deleted immediately after use
Appointment sheets	Exam Delivery	Exam session + 6 months
Booking and payment records (exams and optional products)	Exam Delivery	6 years from date of transaction
Centre records	Contractual Obligation, Exam Delivery, Business Need	6 years (6 months for unsuccessful centres)
Centre monitoring, support visits and support communications	Contractual Obligation, Exam Delivery, Business Need	6 years
Candidate Exam Data - name, DOB, gender, national centre number, candidate ID, external ID – e.g. student in school, centre number, date of exam, qualification grade, level result, absent, email address in relation to digital certificates	Exam Delivery, Business Need, Regulatory Obligation	Indefinite
Candidate Exam Data - Evidence of ID, Address, email, telephone number, ethnicity	Exam Delivery, Business Need	6 years
Exam certificates and transcripts	Exam Delivery, Business Need, Regulatory Obligation	Indefinite
Exam candidate feedback (through surveys)	Business Need	Deleted every exam session
Exam recordings (audio and video)	Exam Delivery, Business Need	3 years (or 10 years for longitudinal studies for research purposes)
Exam report forms, exam scripts, exam papers and marksheets, exam timetables	Exam Delivery, Business Need	3 years
Exam certificate requests including retrievals, replacements, confirmations and transcripts	Exam Delivery, Business Need	6 years
Exam confirmation emails	Exam Delivery, Business Need	Indefinite
Entry Information Forms	Exam Delivery	6 years
Pre-Exam Adjustment Letters	Exam Delivery	3 years
Programme Approval Letters	Exam Delivery	Indefinite
SELT online enrolment data relating to bookings	Exam Delivery	6 months then anonymised
SELT re-enrolment checks	Exam Delivery	2 years
SELT monthly reporting to Home Office	Business Need	2 years
Special educational needs data (SEND)	Exam Delivery	3 years
Trinity Results Verification (TRV) request form	Business Need	Deleted once request completed

**SELT Services as per Home Office requirements**

Record Type	Retention Type	Trinity's role	Retention Period
<b>Exam Delivery</b>			
Booking records (exams)	UKVI Concession Requirement	Processor	1 year for registered candidates who never undertake a test; until expiry of the Home Office Concession for candidates who have successfully passed a test or who have attempted by never successfully passed a test
Exam Data - Name, DOB, ULN, Gender, National Centre No, Candidate ID, external ID - e.g. student in school, Centre No, Date of exam, Qualification grade, level, result, absent, email address in relation to digital certificates, address, email, telephone number, gender, ethnicity	UKVI Concession Requirement	Processor	1 year for registered candidates who never undertake a test; until expiry of the Home Office Concession for candidates who have successfully passed a test or who have attempted by never successfully passed a test
Exam data transfers to Home Office	UKVI Concession Requirement	Processor	Term of Concession
Exam payment records	UKVI Concession Requirement	Processor	6 years
External annual audit records	UKVI Concession Requirement	Processor	Term of Concession + 6 years
Issuing exam results via email	UKVI Concession Requirement	Processor	Term of Concession
Monthly reporting to Home Office	UKVI Concession Requirement	Processor	1 years from report creation
Special educational needs records (SEND)	UKVI Concession Requirement	Processor	1 year for registered candidates who never undertake a test; until expiry of the Home Office Concession for candidates who have successfully passed a test or who have attempted by never successfully passed a test
<b>Security, Safeguarding &amp; Investigations</b>			
Accidents Book	UKVI Concession Requirement	Processor	3 years
Customer complaints	UKVI Concession Requirement	Processor	1 year for registered candidates who never undertake a test. 5 years where an official complaint has been lodged or until the expiry of the Home Office Concession and transferred to the Home Office on expiry of the Concession.
Customer enquiries	UKVI Concession Requirement	Processor	1 year for registered candidates who never undertake a test; until expiry of the Home Office Concession for candidates who have successfully passed a test or who have attempted by never successfully passed a test
SELT Centre CCTV	UKVI Concession Requirement	Processor	60 days
Malpractice Investigations records	UKVI Concession Requirement	Processor	Term of Concession + 6 years
<b>SELT Centre Operations</b>			
Centre staff HR records	UKVI Concession Requirement	Processor	Term of Concession + 6 years

Registrar Checklists	UKVI Concession Requirement	Processor	1 financial year then sent to long-term storage
SELT Centre Monthly meetings records	UKVI Concession Requirement	Processor	1 year

### Learning/Teaching/Development Applications and Tools

Record Type	Retention Type	Retention Period
Digital Music Theory Tool	Business Need, Exam Delivery	Music Gurus: 5 days; Proctoring solution: 30 days
ISE Digital ('ISE-D') Solution	Business Need, Exam Delivery	3 years
NoteLab Accounts; Skill Up! Application Accounts	Business Need	Duration of user activity and where the user account is terminated or dormant, for 1 year from the date of termination or date of the last user activity
Other Trinity Accounts	Business Need	Duration of user activity and where the user account is terminated or dormant, for 3 years from the date of termination or date of the last user activity
Trinity Teacher Directory Accounts	Business Need	Duration of profile existence + 6 years. DBS certificates retained for 6 months (record of DBS result, date and reference number retained for 6 years)

### Results Review, Investigations, Malpractice and Appeals

Record Type	Retention Type/Purpose	Retention Period
Academic Investigation appeals (such as decisions following results reviews, malpractice, special considerations)	Business Need	6 years
Academic referrals (syllabus infringements)	Business Need	6 years
Adverse effects and event notification investigation records	Business Need	Indefinite
Any other Trinity investigations	Business Need	6 years
Centre inspection records	Business Need, Contractual Obligation	6 years
Delayed referrals log	Business Need	2 years
Fake certificates	Security Purposes	Indefinite
Incident reports	Security Purposes, Business Need	Indefinite
Remarking and results review investigation records	Exam Delivery, Business Need	6 years
SELT watchlist / barred list	Security Purposes	Indefinite

**Academics, Testing and Research**

Record Type	Retention Type/Purpose	Retention Period
Longitudinal studies for research purposes	Research Purposes	10 years
Data shared with Scottish and Welsh regulators	Contractual Obligation	Contract duration + 6 years
Expressions of interest	Business Need	5 years
Mock task videos	Business need	6 years
Product analysis for Arts Council England	Contractual Obligation	For the duration of the contract
Product pilots	Business Need	3 years
Submission details and analysis reports on Grade exams / Diploma / Arts Award	Exam Delivery	3 years
Trinity English online surveys	Business Need	5 years

**Arts Award**

Record Type	Retention Type/Purpose	Retention Period
Arts Award Advisers	Business Need	Indefinite for personal information required for adviser status. 6 years for other data. Result is kept indefinitely as per candidate results
Arts Award moderation feedback and moderated portfolio	Business Need	3 years
Arts Award training – course bookings and invoicing	Business Need	Indefinite for personal information required for adviser status. 6 years for other data
Arts mark data	Business Need	Contract duration + 7 years
Data shared in partnership with Arts Council England for Bridge organisations	Contractual obligation	Contract duration + 6 years

**HR records<sup>1</sup>**

Record Type	Retention Type	Retention Period
<b>Applicants</b>		
Applicant recruitment records	Business Need	6 months after completion of selection exercise, unless explicit consent obtained for longer retention

<sup>1</sup> References to retirement include termination of employment for any reason

<b>Employees</b>		
Dietary requirements	Business Need	Deleted after use, if processed
Disciplinary, grievance and performance management records	Statutory and Regulatory Obligation – Employment Rights Act 1996, and Equality Act 2010	Retirement + 6 years, unless agreed with the data subject to delete a record earlier
Diversity, equality & inclusion records	Business Need	Retirement + 6 years
Employee HR records	Statutory Requirement – Employment Rights Act 1996, Working Time Regulations 1998, and Equality Act 2010; Business Need	Retirement + 6 years
Exit/leaver surveys	Business need	6 years
Medical questionnaires	Statutory Obligation – Health and Safety at Work Act 1974	Retirement + 6 years
Payroll & timesheet records	Statutory Obligation – Employment Rights Act 1996	End of Tax Year + 6 years
Pensions records	Statutory Obligation – Pensions Act 2008	Retirement + 6 years
Records relating to health and safety services	Statutory Obligation – Health and Safety at Work Act 1974	6 years after the date of report or contract duration with supplier, whichever shorter
‘Right to Work’ checks	Statutory Requirement – Immigration Act 2016	Retirement + 6 years
SELT call monitoring records	Business Need	3 years
SELT Mystery Shopping records	Business Need	12 months
SELT rotas and time logs, KPI records	Statutory Requirement – Employment Rights Act 1996	3 years (KPI records may be held longer subject to any ongoing investigations)
Third-party learning tools	Business Need	Period of time for which the data subject holds an account or where third-party contract is terminated, whichever shorter
Training records	Business Need	Retirement + 3 years

**Panel Management**

<b>Record Type</b>	<b>Retention Type</b>	<b>Retention Period</b>
<b>Panel Members</b>		
Expression of interest forms	Business Need	6 months
Materials Request Logs	Business Need	Contract duration + date when materials are returned
Police clearance and Right to Work records	Safeguarding Purposes, Contractual Obligation	Contract duration + 6 years (or 6 months for unsuccessful applicants)
Recruitment, training, monitoring, standardisation and deployment records	Business Need, Regulatory Purposes	Contract duration + 6 years (or 6 months for unsuccessful applicants)
Visa and travel records	Business Need, Statutory Obligation as per type of data	5-7 years

**Marketing Services**

Record Type	Retention Type	
Analytics website cookies and heat maps	Business Need	Indefinite unless unsubscribed
Case Studies and Testimonials	Business Need	Indefinite unless consent withdrawn
Consent Forms	Legal Obligation	Indefinite unless consent withdrawn
Email Tracking Analytics	Business Need	Indefinite unless unsubscribed
Google Account consent records (relevant Trinity cookies)	Business Need	14 months
Mailing lists, guest and conference attendee lists	Business Need	Indefinite unless unsubscribed
Marketing Promotions (B2B and B2C)	Business Need	Indefinite unless unsubscribed
Marketing Surveys	Business Need	1 year
Online events and webinars	Business Need	Indefinite unless unsubscribed
Prize draws / competitions	Business Need	6 months
Promotional Videos	Business Need	Indefinite unless consent withdrawn
SELT future qualification requirements reminders	Business Need	Indefinite unless unsubscribed
Lead capture and lead generation	Business Need	Indefinite unless unsubscribed

**Customer Services Records**

Record Type	Retention Type	Retention Period
Complaints	Business Need	6 years
'Contact Us' web page records	Business Need	6 years
'Freddy' bot	Business Need	2 years
Helpline phone recordings	Business Need	6 years
Service Desk tickets	Business Need	6 years
TESOL bot ('Tesolica')	Business Need	Deleted once request completed
Website Bot/Chat Feature records	Business Need	6 years

**Legal Compliance Records**

<b>Record Type</b>	<b>Retention Type</b>	<b>Retention Period</b>
Bequests and legacies	Statutory Requirement, The Limitation Act 1980	6+1 years from monies received
Bids & tenders records	Business Need, The Limitation Act 1980	6+1 years
Contracts (with associated documents, contact details and communications)	Contractual Obligation, The Limitation Act 1980	Contract duration + 6 years
Cease and desist letters	Business Need	6+1 years
DBS records	Statutory Requirement – the Safeguarding Vulnerable Groups Act 2006	Full certificate kept for 6 months after the decision is made. Record of the result, date and reference number kept retirement + 6 years (or 6 months for unsuccessful applicants)
Documents notarised by the Public Notary Office	Business Need	Contract duration + 6 years or, if freestanding, 3 years
Deeds	Contractual Obligation	12 + 1 years
Gifts and hospitality declarations	Statutory Requirement – The Bribery Act 2010	3 years
Legal advice	Business need	Indefinite
Learner Record Services	Statutory Requirement - The Apprenticeships, Skills, Children and Learning Act 2009	Until a learner is 80 years and has not engaged with a learning provider for 7 years
Licence agreements	Contractual obligation	7 years after a publication goes out to print
Litigation records – UK only	Statutory Requirement - The Limitation Act 1980	6 + 1 years after case has closed
Litigation records – UK only, court involvement	Statutory Requirement - The Limitation Act 1980	15 years after case has closed or indefinitely. Decided on a case-by-case basis
Litigation records – non-UK	In line with local laws	Retained as per local laws
Safeguarding records (including referrals)	Statutory Requirement – the Safeguarding Vulnerable Groups Act 2006	Indefinite
Modern anti-slavery declarations	Statutory Requirement – UK Modern Slavery Act 2015	6+1 years after signature
Trademark certificates and letters	Business Need	Indefinite (associated documents kept for 6 years after trademark is discontinued)

**Regulatory Compliance Records**

<b>Record Type</b>	<b>Retention Type</b>	<b>Retention Period</b>
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Company Policies & Procedures	Regulatory Obligation – Ofqual Condition A7 and B3	Indefinite. Earlier versions anonymised if personal data exists.
Conflict of Interest Forms	Regulatory Obligation – Ofqual Condition A4	6 years
Ethicspoint (Incident Management)	Regulatory Obligation	The applicable limitation period for the specific incident
Fit & Proper Person Declarations	Statutory Requirement – Money Laundering, Terrorist Financing and Transfer of Funds regulations 2017	6 years after departure
Replaced letters from regulators with Regulators Policy Papers and Consultations	Regulatory Requirement	Indefinite unless superseded by an amended or updated version
Malpractice and Maladministration records	Regulatory Requirement – Ofqual Condition B4	Indefinite
Recognition governmental submission	In line with local laws	Indefinite
Serious Incident Reporting	Regulatory Obligation – Ofqual Condition B3	Indefinite
Special Consideration Requests	Regulatory Requirement – Ofqual Condition G7	6 years
Submissions to Department of Education	Contractual Obligation	5 years or as long as it's necessary only
Submissions to Regulators	Regulatory Obligation – Ofqual Condition B4	Indefinite feeds into the Official Government statistics
Submissions to UCAS	Contractual Obligation	As long as it's necessary only

### Buildings/Facilities & Service Improvement

Record Type	Retention Type	Retention Period
Building access records	Business Need, Security Purposes	Lease duration + 1 year
Business travel account and bookings	Business Need, Statutory Obligation as per type of data	5-7 years depending on type of personal data and applicable legislation
Couriering services records	Business Need	3 years
CCTV footage	Business Need, Security and Safeguarding Purposes	60 days (or indefinitely for safeguarding purposes)
CCTV footage (SELT)	Business Need, Security and Safeguarding Purposes	90 days (or indefinitely for safeguarding purposes)
Insurance records	Business Need	Indefinite
Fire Risk Assessment and related documents	Business Need	Indefinite
Personal Emergency Evacuation Plans	Business Need	For as long as the plan is valid

**Company Secretarial Records**

Record Type	Retention Type	Retention Period
Annual Returns and other filings	Statutory Obligation as per the Companies Act 2006; subject to local laws	3 years or as per local laws
Apologies and attendee registers	Business Need	Indefinitely
Board minutes, board resolutions and board papers	Business Need, Statutory Obligation as per the Companies Act 2006	Indefinite
Digital certificates	Business Need	Deleted after expiration date
Digital signatures	Business need	3 months after departure of an employee, 6 months after departure of director or trustee
External and Internal audit papers	Business Need	Indefinite
International subsidiary records	Statutory and Regulatory Obligation as per local law	Retained as per local laws
Meeting notes and agendas	Business Need	Indefinite
Member records – board apprentice	Business Need	1 year (key personal data kept indefinitely on the ‘register of past board apprentices’ as part of historic record)
Member records – trustees, Audit & Risk Committee, Nominations and Remuneration Committee	Business Need & Limitation Period	Length of appointment + 6 years (key personal data kept indefinitely on the relevant register of past members as part of historic record)
Resignation letters	Business Need	12 months after departure

**Data Protection Records**

Record Type	Retention Type	Retention Period
Breaches register	Regulatory Requirement	Indefinite
Breaches records	Business Need	6 + 1 years after the matter has been closed
Complaints	Business Need	7 years after the complaint has closed except in litigious circumstances or where a regulator has opened an investigation
Data Protection Impact Assessment (DPIA)	Regulatory Requirement	6 years
Data Subject Access Request Register	Business Need	Indefinite
Data Subject Access Requests (DSAR)	Regulatory Requirement	7 years after the data subject request (except in litigious circumstances in which case data will be kept for 15 years after DSAR or court case has closed)
Training logs	Business Need	3 years

Record of Processing Activities	Regulatory Requirement	7 years after the processing activity that the data subject is responsible for has ceased occurring at Trinity or another data subject takes on the responsibility
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### Finance

Record Type	Retention Type	Retention Period
Expenses, invoices and third-party accounts payable records	Statutory and Regulatory Obligation - s386 of the Companies Act 2006, HM Treasury guidelines	6+1 years
Annual accounts	Statutory and Regulatory Obligation - S388 of the Companies Act 2006 & HM Treasury guidelines	6 years
Bank account details	Statutory Obligation – HM Treasury guidelines	Contract duration + 6 years
Bank account and contact details (publishers and composers)	Business Need – payment of royalties	Death + 70 years
Budget, forecasting costs, scenario planning/modelling records; performance reporting	Business Need	6+1 years
Other financial information	Statutory and regulatory requirement - HM Treasury guidelines, Companies Act 2006	6 + 1 years
Payroll records (UK examiners and employees)	Business Need, Statutory Obligation – as per the Taxes Management Act 1970 & Regulatory Obligation as per HMRC requirements	Contract duration + 6 years
Payment Solutions Provider records (Verifone – independent third party)	Regulatory Obligation – HM Treasury guidelines	5 years
Recruitment Approval Form	Regulatory Obligation – HM Treasury guidelines	6 + 1 years

### Employee communications / IT

Record Type	Retention Type	Retention Period
IT back-ups	Business Need	1 year
IT Tickets	Business Need	7 years
Mobile phones and dongles	Business Need	6 years from end of contract with Conosco; 7 years from end of contract with Vodafone
Microsoft Teams records	Business Need	30 days from employee leave date
Microsoft Teams recordings and transcripts	Business Need	30 days from employee leave date
Onboarding and offboarding set up records	Business Need	7 years

OneDrive records	Business Need	30 days from employee leave date
Outlook 365 Emails	Business Need	7 years
Recognition inbox	Business Need	Emails deleted after required checks
Security Risk Incident Reporting inbox	Security Purposes	3 years