

# DATA MANAGEMENT (RETENTION) POLICY

Last updated in October 2018

## Purpose

The purpose of this policy to describe the RCM's data retention arrangements for each of its administrative areas. The policy is reviewed annually or whenever circumstances change sufficiently to warrant an earlier review.

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## Centre for Performance Science

Data	Retention period	Retention reason	Lawful basis
Research source data	No less than 10 years. Project specific.	Transparency/replication/publisher and funder requirements	<b>b) Contract:</b> Performance of a contract <b>c) Legal obligation:</b> the processing is necessary for you to comply with the law (not including contractual obligations)
Ethical approval submissions Research consent forms Master files for RCTs	No less than 10 years. Project specific.	Kept for as long as data are retained	<b>b) Contract:</b> Performance of a contract <b>c) Legal obligation:</b> the processing is necessary for you to comply with the law (not including contractual obligations)
Research funding applications and contracts/agreements	No less than 10 years. Project specific.	Kept for as long as data are retained	<b>b) Contract:</b> Performance of a contract <b>c) Legal obligation:</b> the processing is necessary for you to comply with the law (not including contractual obligations)
Research participant contact details	No less than 3 years. Project specific.	Vital interest/member checks/follow on research	<b>b) Contract:</b> Performance of a contract <b>c) Legal obligation:</b> the processing is necessary for you to comply with the law (not including contractual obligations)
Student references	Period of study, plus 7 years	Support alumni	9(2)(j): Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)

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## Creative Careers Centre

Data	Retention period	Retention reason	Lawful basis
HESA/DIHE Returns from RCM Graduates	Three years.	To follow HESA Guidelines.	<b>c) Legal obligation:</b> the processing is necessary for you to comply with the law (not including contractual obligations).
Email List of Graduates for the graduates bulletin, including instrument, graduation year and name	Graduates opt-in to receive the bulletin – it is not an automatic service upon graduation. They can unsubscribe at any point.	They have asked to receive the service.	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Financial details of applicants to the instrument loan fund	Until the loan has been paid off.	In case they default on any payments. They are in a contractual agreement until the loan is cleared.	<b>b) Contract:</b> Performance of a contract
Biographies of many students and graduates.	Until they no longer require the services of the Creative Careers Centre. NB Biographies are also found on musicians' websites for promotional purposes.	For business use – programmes and promotional purposes.	<b>b) Contract:</b> Performance of a contract
Tier 4 visa holders and their work placements.	Indefinitely	For audit/record keeping/UKVI inspection purposes and business use.	<b>c) Legal obligation:</b> the processing is necessary for you to comply with the law (not including contractual obligations)
Email addresses and phone numbers for students and graduates.	Until they no longer use the services of the Creative Careers Centre.	So we that can offer them work opportunities.	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Bank details for students/graduates/externals.	Until they no longer use the services of the Creative Careers Centre.	So that we can pay them for any work that they do through the Creative Careers Centre.	<b>(b) Contract:</b> Performance of a contract

Data	Retention period	Retention reason	Lawful basis
Payment details for PE/Gateway engagements.	Three years.	To comply with regulations.	<b>(c) Legal obligation:</b> the processing is necessary for you to comply with the law (not including contractual obligations).

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## Development & Alumni Engagement: Alumni

Data	Retention period	Retention reason	Lawful basis
Contact and course details of individual alumni	Indefinitely	Historical reference and to facilitate a growing alumni community  If you cease to have an active relationship with us we will retain basic information to avoid duplicating information and sending you unwanted communications in the future	<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.
Alumni publications	Indefinitely	Historical reference	<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.
Records documenting enquires from alumni and responses	End of activity + 1 year	In case of further queries from the same individual	<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.
Responses from alumni surveys and focus groups	Indefinitely	Consent has been given - essential for future planning	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Alumni event planning & administration	End of event + 3 years	Future planning and analysis. JISC guidance	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Alumni strategy, analysis and reporting	Superseded + 5 years	Enables measurement of and reporting on alumni engagement. JISC guidance	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.

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## Development & Alumni Engagement: RCM supporters

Data	Retention period	Retention reason	Lawful basis
Detailed donation information including gift aid	Last donation + 7 years	To comply with HMRC regulations	<b>(c) Legal obligation:</b> the processing is necessary for you to comply with the law (not including contractual obligations).
Core record of donation	Indefinitely	Historical reference	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.  <b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.
Fundraising strategy, analysis and reporting	Indefinitely	Demonstrates we are meeting our goals as a charity and can be used to secure future funding	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Fundraising procedures	Superseded + 3 years	JISC guidance	<b>(b) Contract:</b> Performance of a contract
Supporter publications	Indefinitely	Historical reference	<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.
Event planning & administration	End of event + 3 years	Future planning and analysis. JISC guidance	<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.
Research identifying potential supporters	6 months	Essential for business continuity and campaign planning	<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.

Data	Retention period	Retention reason	Lawful basis
Supporters' personal data (incl. contact details and philanthropic information)	Indefinitely	If you cease to have an active relationship with us we will retain basic information to avoid duplicating information and sending you unwanted communications in the future	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
RCM's relationship with supporters (incl. communications sent and received)	Indefinitely	In case a gift is left in a Will and we're required to evidence the nature of their relationship with us	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Contracts and gift agreements / letters of intent	Termination of contractual agreement + 6 years	Historical reference	<b>(b) Contract:</b> Performance of a contract

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## Digital

Data	Retention period	Retention reason	Lawful basis
Staff and student names, internal email addresses, ID card numbers on internal database	Records are kept for up to 6 months until the staff or student leaves.	Defines user record across multiple administrative systems; required to maintain records including records of subsequent data processing and deletions from other systems	<b>(b) Contract:</b> Performance of a contract
Security logs and internet usage records	2 months	Used to block and prevent malware attacks	<b>(b) Contract:</b> Performance of a contract
Records taken from internal database for the use of login for students and staff.	Records are kept for up to 6 months until the staff or student leaves.	Used for the following reasons <ul style="list-style-type: none"> <li>• Room booking software</li> <li>• Wireless access for staff/students</li> <li>• Helpdesk Software for when staff and students log issues and need help</li> <li>• ID card access</li> <li>• Phone system for assigning a name to a telephone and voicemail messages</li> <li>• Printer access – used to login into printers and access credit.</li> </ul>	<b>(b) Contract:</b> Performance of a contract
Browser data and download data	Indefinitely	Used by anti virus to prevent malware attacks on system and to continually learn from other malware.	<b>(b) Contract:</b> Performance of a contract
Network Management tool. Records taken from internal database for identifications of users who access PC.	Information is taken from internal database which is updated as user leaves or stays.	Tracking access to PC and where devices are located on the network. Names are assigned to devices	<b>(b) Contract:</b> Performance of a contract

Data	Retention period	Retention reason	Lawful basis
Data from all Shared drives	7 Years	Backup of the data hosted at the RCM, kept for 7 years onsite and off site.	<b>(b) Contract:</b> Performance of a contract
Staff & student personal drives	Data kept up to 6 months* after staff members leave and up to 6 months after students final year.	In case staff and student have forgotten to save anything or any work related items left for manager	<b>(b) Contract:</b> Performance of a contract
Emails	Up to 6 months for staff after leaving the RCM. Alumni can request email for life for email access only.	Emails are kept for up to 6 months when a staff member leaves as managers may need access to information which an employee was working on.	<b>(b) Contract:</b> Performance of a contract
Full name and email address on Office365	Data kept up to 6 months after staff members leave and up to 6 months after students final year. Alumni can request email for life for email access only.	Closing the office365 is part of the account closure method.	<b>(b) Contract:</b> Performance of a contract
Staff Booking Forms - Hard copy of usernames which is destroyed every calendar year	1 year	Keep track of equipment being borrowed and just in case its not returned we can review.	<b>(b) Contract:</b> Performance of a contract
Emails or quarantined emails	Data kept up to 6 months* after staff members leave and up to 6 months after students final year.	Tracks each email to make sure no malware is attached or hidden	<b>(b) Contract:</b> Performance of a contract
Student recording agreements	Indefinitely	Proof of permission granted by students to use recordings of RCM performances for various purposes such as study, research, archiving and promotion	<b>(b) Contract:</b> Performance of a contract

Data	Retention period	Retention reason	Lawful basis
Contact details – Email Addresses + Phone Numbers	Indefinitely	Liaising with clients on arrangements for Recording Sessions and to provide download links after any sessions take place.	<b>(b) Contract:</b> Performance of a contract
Student employee overtime, leave, timesheet records	2 years in Digital; 5 years in Finance	Records for budget keeping and analysis of student freelancer use for future financial planning.	<b>(b) Contract:</b> Performance of a contract
Financial records (budget sheets, invoice copies etc)	Indefinitely	Internal records, reference.	<b>(b) Contract:</b> Performance of a contract
Project Files and documentation (including video files)	Indefinitely	Use of Student Recordings for editing/marketing purposes and to retain in the RCM Archive of Audio/Visual Concert Recordings	<b>(f) Legitimate interests:</b> the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
Learning Management System: coursework, marks, discussions and comments	12 months after graduation	Retain for after final graduation/results (including any appeals window) to allow verification of results and statistical analysis/reporting as required	<b>(b) Contract:</b> Performance of a contract

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## Estates

Data	Retention period	Retention reason	Lawful basis
Drawing plan with names of designers.	Indefinitely	Intellectual property rights have been transferred from designers to the RCM. Relevant warranties are associated with these plans which are applicable in case of issues that might arise associated with solutions shown on these drawings.	<b>(b) Contract:</b> Performance of a contract
CAFM helpdesk – Staff names and numbers	Indefinitely	The system requires details of the person who has logged a task or fault with the Estates and facilities team. Details of tasks will need to be kept on the system to have a clear history of issues reported around the campus which may be referred to in the future.	<b>(b) Contract:</b> Performance of a contract
Finance Invoices	1 year	To ensure that the required information is available when an invoice is queried by a supplier or the finance team.	<b>(b) Contract:</b> Performance of a contract
CCTV – all recorded footage (including faces)	Current 30 days – switching to 1 week during upgrade in summer	To be able to follow up on any investigations and ensure the building remains safe and secure.	(e) Performance of a task carried out in the public interest
Downloaded CCTV images and footage	5 years	To be able to follow up on any investigations and ensure the building remains safe and secure.	(e) Performance of a task carried out in the public interest
Accident/Incident reports	3 years	To ensure compliance with all H&S laws and regulations.	(c) Comply with legal obligation

Data	Retention period	Retention reason	Lawful basis
Fire Marshall and First Aider Lists	1 year	To ensure that any requests for training records can be accessed. To ensure that the required information is available for any ongoing investigations.	(e) Performance of a task carried out in the public interest
Access Control System data	1 year	To be able to follow up on any investigations and ensure the building remains safe and secure.	(e) Performance of a task carried out in the public interest
Locker key database	1 year	To ensure lost property and missing keys can be traced and items reunited with their owner.	<b>(b) Contract:</b> Performance of a contract
Stewarding rotas and shift information	3 years	To be able to confirm shift times and hours for stewards in case of Tier 4 and visa queries.	<b>(b) Contract:</b> Performance of a contract
Show and performance reports/checklists	3 years	To be able to retrieve vital information in preparation for future events, map out changes and spot trends. Information may be kept post this time but anonymised.	(e) Performance of a task carried out in the public interest
Front desk sign in sheets	1 year	To ensure that the required information is available for any ongoing investigations. If records need to be kept for trend spotting reasons, data will be anonymised.	(e) Performance of a task carried out in the public interest
Key sign out register	1 year	To ensure that the required information is available for any ongoing investigations and security reasons.	<b>(b) Contract:</b> Performance of a contract

Data	Retention period	Retention reason	Lawful basis
Contractors signing in/ out register	1 year	To ensure that the required information is available for any ongoing investigations and security reasons.	<b>(b) Contract:</b> Performance of a contract
Contractors and supplier details/ documents/contact info	3 years post contract termination	To ensure that contract performance is recorded and any remaining issues can be snagged. Any information that needs to be kept will be anonymised.	<b>(b) Contract:</b> Performance of a contract
Security records for events/performances	3 years	To be able to follow up on any investigations and ensure the building remains safe and secure.	(e) Performance of a task carried out in the public interest
Tender documents and potential contractor/supplier CV's	Indefinitely – reviewed every 5 years	To ensure compliance with regulated competitive tender process	<b>(b) Contract:</b> Performance of a contract
Legal documents/witnessed signatory's/contracts (for example – lease, party wall agreements, cleaning contract, collateral warranties etc)	Indefinitely – reviewed every 5 years	To ensure compliance with regulated legal process	<b>(b) Contract:</b> Performance of a contract

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## Finance

Data	Retention period	Retention reason	Lawful basis
Debit/Credit Card Receipts (Student transactions)	2 years in Finance & a further 5 years in archiving	These print out automatically & are filed away with a daily transaction log. Sometimes used for refunds to be issued & to ensure that refunds are issued back on the same card.	<b>(b) Contract:</b> Performance of a contract
Data from US Loan applications	2 years in Finance & a further 5 years in archiving	US Loans Audits	<b>(b) Contract:</b> Performance of a contract
Bank Details for Students	On-going in Outlook, the G drive & on Resource, 2 years in Finance & a further 5 years in archiving.	Details need to be received via email from Student & attached as supporting documentation to the payment requests for verification purposes Details are entered on to spreadsheets for imports to PT-X to be uploaded	<b>(b) Contract:</b> Performance of a contract
Student Details - address/phone number etc.	On-going on Resource, the G drive & in Outlook 2 years in Finance & a further 5 years in archiving	To create student accounts & for invoices to be sent out on Resource. Copies of letters sent to Students retained on the Finance Drive and in Outlook as proof of being sent Instalment plan applications received filed away as proof of application (for JD)	<b>(b) Contract:</b> Performance of a contract
Payroll system & paperwork received from HR – starter details including address, bank details, NINO, date of birth, contact details	7 years payroll records	HMRC and pension details	<b>(b) Contract:</b> Performance of a contract

Data	Retention period	Retention reason	Lawful basis
Student expenses including bank details	2 years in Finance & a further 5 years in archiving	Accounting retention	<b>(b) Contract:</b> Performance of a contract
Data for ILF loans including bank details, address	2 years in Finance & a further 5 years in archiving	Accounting retention	<b>(b) Contract:</b> Performance of a contract

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## Human Resources

Data	Retention period	Retention reason	Lawful basis
Directorate approval to recruit	Held on the successful candidates personnel file until the termination of their employment + 6 years	Internal audit purposes	<b>(b) Contract:</b> Performance of a contract
Job description, further particulars & advert documents	Held on the successful candidates personnel file until the termination of their employment + 6 years		<b>(b) Contract:</b> Performance of a contract
Unsuccessful candidates: equal opportunities monitoring data	Completion of the recruitment process + 6 months & Anonymised Equal Opportunities data is retained for a suitable period of time for statistical purposes	To meet legal requirements to monitor data as part of the public sector equality duty (PSED) of the Equality Act 2010	6(1)(c) – Processing is necessary for compliance with a legal obligation & 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Shortlisting grid & notes	Completion of the recruitment process + 6 months	Time limits on litigation	<b>(b) Contract:</b> Performance of a contract
Interview notes & paperwork	Completion of the recruitment process + 6 months	Time limits on litigation	<b>(b) Contract:</b> Performance of a contract

Data	Retention period	Retention reason	Lawful basis
Right to Work documents (e.g. copies of passports, visas)	Termination of employment + 2 years	Home Office requirement	6(1)(c) – Processing is necessary for compliance with a legal obligation & 9(2)(b) – Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
Application documents	Termination of employment + 6 years	Time limits on litigation	<b>(b) Contract:</b> Performance of a contract
Authorisation of appointment form	Termination of employment + 6 years	Internal audit purposes	<b>(b) Contract:</b> Performance of a contract
Offer letter	Termination of employment + 6 years		<b>(b) Contract:</b> Performance of a contract
Two employment references	Termination of employment + 6 years		<b>(b) Contract:</b> Performance of a contract
Copy of highest academic / professional qualifications	Termination of employment + 6 years		<b>(b) Contract:</b> Performance of a contract
DBS check records	Termination of employment + 6 years		6(1)(c) – Processing is necessary for compliance with a legal obligation & 9(2)(b) – Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
Contractual information	Termination of employment + 6 years		<b>(b) Contract:</b> Performance of a contract

Data	Retention period	Retention reason	Lawful basis
Personal contact details	Termination of employment + 6 years		<b>(b) Contract:</b> Performance of a contract
Emergency contact details	Termination of employment + 6 years		<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.
Equal opportunities data for HESA purposes	Termination of employment + 6 years & Anonymised Equal Opportunities data is retained for a suitable period of time for statistical purposes	Necessary for statistical research purposes to meet the public sector equality duty (PSED) of the Equality Act 2010	6(1)(c) – Processing is necessary for compliance with a legal obligation & 9(2)(i) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Appraisal records	Termination of employment + 6 years		6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Training & professional development record	Termination of employment + 6 years		6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Data	Retention period	Retention reason	Lawful basis
Sickness absence records	Termination of employment + 6 years		6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract & 9(2)(b) - Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
Occupational health record, reports & clearance certificates	Termination of employment + 6 years	Referral to OH require 2 years' worth of details & Time limits on litigation	9(2)(h) – Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional
Maternity/Paternity/Adoption Leave records	Termination of employment + 6 years		6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Disciplinary and grievance files	Termination of employment + 6 years or; If a written warning, at the time of expiry		6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Data	Retention period	Retention reason	Lawful basis
Termination of employment by resignation, redundancy, retirement, dismissal	Termination of employment + 6 years		6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Pay information (including bank details, payslips, staff benefits, expense claims)	Termination of employment + 6 years		6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Maternity/Paternity/Adoption pay records	End of the tax year they relate to + 3 years	The Statutory Maternity Pay (General) Regulations 1986	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract & 9 (2) (b) Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
Occupational & Statutory sick pay records	Termination of employment + 6 years		6(1)(c) – Processing is necessary for compliance with a legal obligation & 9(2)(b) – Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
Invoices from individuals providing services on a self-employed basis	End of the financial year to which the invoice relate + 7 years	In line with HMRC guidelines	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Data	Retention period	Retention reason	Lawful basis
Interview travel expense claims	End of the financial year to which the expense form relate + 7 years		6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Pension records	USS, TPS & Nest: 12 years after benefit ceases RCM Scheme: Indefinitely		6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

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## Junior Department

Data	Retention period	Retention reason	Lawful basis
Application form (successful applicants)	Indefinitely	Historical archive, statistical analysis, benchmarking, monitoring widening participation	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Audition panel reports and offer letter/acceptance paperwork/correspondence	Indefinitely	Record of basis for admission or rejection, demonstrates justification of decision, statistical trend analysis, record of achievement for enrolled students	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Student information request forms	End of academic year in which student leaves + 1 year	Confirmation of parental contact information, student medical information and school information at time of acceptance of contract	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Student reports (bi-annual)	End of academic year in which student leaves + 1 year	Historical archive, record of achievement for reference purposes	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Data	Retention period	Retention reason	Lawful basis
Student reports (final)	Indefinitely	Historical archive, record of achievement for reference purposes	6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest of a data subject or another person 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Internal bursary/funding applications and correspondence	Indefinitely	Statistical trend analysis, resource and financial planning purposes, to demonstrate justification of decisions	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
External bursary/funding applications (eg DfE MDS funding)	End of academic year in which student leaves + 2 years	Statistical trend analysis, resource and financial planning purposes, to demonstrate justification of decisions. In order to comply with DfE paperwork retention requirements.	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Equal opportunities data	End of academic year in which student leaves + 1 year (NB anonymised EO data is retained for statistical purposes)	Monitoring Widening Participation	6(1)(f) Processing is necessary for your legitimate interests or the legitimate interests of a third party



Data	Retention period	Retention reason	Lawful basis
Students information spreadsheet (contact and timetable information)	Indefinitely	Statistical trend analysis, resource and financial planning purposes	6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest of a data subject or another person
Students information spreadsheet (medical and SEN information)	End of academic year in which student leaves + 1 year	Security purposes, library services	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Re-enrolment forms	End of academic year in which student leaves + 1 year	Educational planning purposes, record progression through programme	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Photos for ID cards (students/parents)	End of academic year in which student leaves	Security purposes, library services	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Student attendance records (absence lists, teacher registers, ensemble attendance spreadsheet)	Indefinitely	Historical archive, programme monitoring, trend analysis, resource and educational planning purposes	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(i) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)

Data	Retention period	Retention reason	Lawful basis
Student discipline case file	Indefinitely	Maintaining consistency, precedent for decisions	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Student complaints and appeals files	6 years following completion of case	Maintaining consistency, precedent for decisions	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
ABRSM exam entries data	End of academic year in which student leaves + 1 year	To confirm exam entry status of individual JD student(s)	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Instrument hire records	Indefinitely	Historical archive, resource and planning purposes	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)

Data	Retention period	Retention reason	Lawful basis
Concert programmes	Indefinitely	Historical archive, programme monitoring	6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest of a data subject or another person 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Leavers' destination information	Indefinitely	Historical archive, programme monitoring	9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Photos/videos	Indefinitely	Reference material for documenting history of Department	9(2)(a) – Explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Visit Day application data	Completion of admissions process + 1 year	Planning of Visit Day programmes	6(1)(f) Processing is necessary for your legitimate interests or the legitimate interests of a third party

Data	Retention period	Retention reason	Lawful basis
Application data (unsuccessful applicants)	Completion of admissions process + 1 year	To demonstrate justification of decisions; to aid dispute resolution	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Audition panel reports and rejection letter (unsuccessful applicants)	Completion of admissions process + 1 year	To demonstrate justification of decisions; to aid dispute resolution	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Teachers' contact information	Termination of contract	Compliance with employment legislation	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Deputies' contact information	Until removed from deputies list (or DBS renewal)	Contact information retained whilst teachers are on dep list in order to facilitate work within the department until DBS is renewed (every three years)	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Teacher/deputy attendance records	Indefinitely	Historical archive; programme monitoring	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)

Data	Retention period	Retention reason	Lawful basis
Teacher registers	Indefinitely	Historical archive; programme monitoring; reference documentation for queries	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Fee invoice breakdown information	End of academic year + 1 year	Reference documentation for queries; to aid dispute resolution	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Instrument hire charges	End of academic year + 1 year	Reference documentation for queries; to aid dispute resolution	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Financial statements (accruals, prepayments and deferrals)	End of academic year + 1 year	Reference documentation for queries; to aid dispute resolution	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Payment (payroll) records	End of academic year + 1 year	Reference documentation for queries; to aid dispute resolution	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

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## Library

Data	Retention period	Retention reason	Lawful basis
Student names in KOHA (current)	Duration of RCM course	Record of transactions with library ie what material they have borrowed	<b>(b) Contract:</b> Performance of a contract
Student names in KOHA (former students in debt)	Until debts are discharged	Records are only kept if the student has left without returning all material or paying all fines	<b>(b) Contract:</b> Performance of a contract
Staff names in KOHA (current)	Duration of RCM employment	Record of transactions with library ie what material they have borrowed	<b>(b) Contract:</b> Performance of a contract
Staff names in KOHA (former staff in debt)	Until debts are discharged	Records are only kept if the staff member has left without returning all material or paying all fines	<b>(b) Contract:</b> Performance of a contract
Student & staff names (alumni & ex-staff)	Until debts are discharged	For individuals who left before we had an online catalogue/library management system, paper records have been kept where they left without returning all material or paying all fines.	<b>(b) Contract:</b> Performance of a contract
External researchers consulting special collection material	Indefinite	New researchers are asked to sign our visitors' book and they sign for every item they consult.	<b>(a) Consent:</b> The data subjects have given explicit consent to process their data.
Collection information – Gift/loan information	Indefinite	Records kept of any collections/items given to the library and the legal agreement (whether loan or gift) relating to the collection.	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.

## Marketing & Communications

Data	Retention period	Retention reason	Lawful basis
Open Day registrations	2 years	Planning of open day	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Prospectus requests	2 years	Record and processing of requests to receive Prospectus	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
HE Institutional Contact information	Indefinitely	For recruitment marketing purposes using publically available HE institutional contact information	<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.
Ticket purchases	Indefinitely	To allow customers to use and maintain their online account	<b>(b) Contract:</b> Performance of a contract
Merchandise purchases	Indefinitely	To allow customers to use and maintain their online account	<b>(b) Contract:</b> Performance of a contract
Memberships	Indefinitely	To allow customers to use and maintain their online account	<b>(b) Contract:</b> Performance of a contract
Donations	Indefinitely	Historical reference	<b>(b) Contract:</b> Performance of a contract
Music organisations & specialist shops	Indefinitely	For event marketing purposes using publically available sources	<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.
Marketing communications and publications	Indefinitely	For historical reference	<b>(f) Legitimate interests:</b> the processing is necessary for the legitimate interests or the legitimate interests of a third party.

Data	Retention period	Retention reason	Lawful basis
Comments & Error reporting on website	2 years	To respond to feedback.	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Student Profiles	Indefinitely	Profiles of current and former students for marketing purposes	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Staff Profiles	Length of employment	Profiles of current staff members for marketing purposes and displayed on website	<b>(b) Contract:</b> Performance of a contract
Images	Indefinitely	For marketing purposes and historical reference	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Video	Indefinitely	For marketing purpose and historical reference	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.

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## Performance & Programming and Faculties

Data	Retention period	Retention reason	Lawful basis
P&P Student orchestral placements/audition marks	Indefinitely	Record of student achievement, not held elsewhere, historical interest?	<b>(b) Contract:</b> Performance of a contract
P&P Leave of Absence requests data	Indefinitely	For reference when looking at a student's attendance pattern	<b>(b) Contract:</b> Performance of a contract
Faculties – Faculty classes, participants and professors	Indefinitely	For end of year board of examiners/absence disputes/etc.	<b>(b) Contract:</b> Performance of a contract
Emails from students about getting out of projects or faculty activity	Indefinitely	For reference when looking at a student's attendance pattern	<b>(b) Contract:</b> Performance of a contract
Accompanists details and hours logged	Indefinitely	Financial Records/To monitor the progress of the scheme	<b>(b) Contract:</b> Performance of a contract
Chamber music group registrations, coaching and concert details	Indefinitely	Historical interest?	<b>(b) Contract:</b> Performance of a contract
Visiting artists arrangements, fees and contracts	Indefinitely	For reference when planning future visits	<b>(b) Contract:</b> Performance of a contract
Payroll spreadsheets	Indefinitely	Financial Records	<b>(b) Contract:</b> Performance of a contract
Copies of invoices	Indefinitely	Proof of payment	<b>(b) Contract:</b> Performance of a contract
Competition entries, winners, adjudicators	Indefinitely	For reference/enquiries from external parties/graduation programme	<b>(b) Contract:</b> Performance of a contract

Data	Retention period	Retention reason	Lawful basis
Instrument loans	Indefinitely	For reference/stock checks	<b>(b) Contract:</b> Performance of a contract
Contact details and emails from donors of instruments	Indefinitely	For reference/keeping in touch/proof of ownership	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.
Trade Companies Contact Details (Percussion Festival)	Indefinitely	For reference in terms of fees/returning customers	<b>(b) Contract:</b> Performance of a contract
Offer Holders Contact Details/Attendance/Consultation Lessons	Indefinitely	To track incoming students/monitor success of Open Days	<b>(b) Contract:</b> Performance of a contract
Copies of passports and resident cards	Indefinitely	Proof of Right to work	<b>(b) Contract:</b> Performance of a contract

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## Research Projects

Full details of the RCM's data management policy for research projects can be found on the research pages of the RCM website [here](#).

## Registry

Data	Retention period	Retention reason	Lawful basis
Application data from UCAS and through direct process	Indefinitely	Historical archive, statistical analysis, benchmarking, monitoring widening participation	<b>(b) Contract:</b> Performance of a contract
<b>Successful applicants:</b> Applicant references, Fee Status Questionnaires, audition/interview reports, application supporting materials, evidence of meeting offer conditions	Indefinitely	Record of basis for admission	<b>(b) Contract:</b> Performance of a contract
<b>Rejected, declined and withdrawn applications:</b> Applicant references, Fee Status Questionnaires and audition/interview reports, application supporting materials	Recruitment cycle plus one year	To demonstrate justification of decisions, to aid dispute resolution	<b>(b) Contract:</b> Performance of a contract
Audition Fee Waiver application supporting evidence	Recruitment cycle plus one year	To demonstrate justification of decisions, to aid dispute resolution	<b>(b) Contract:</b> Performance of a contract
Audition/interview results	Indefinitely	Record of basis for admission or rejection, demonstrates justification of decision, statistical trend analysis, record of achievement for enrolled students	
Audition Schedules	Indefinitely	Planning purposes	<b>(b) Contract:</b> Performance of a contract

Data	Retention period	Retention reason	Lawful basis
On-line video/portfolio applications on Embark	Recruitment cycle plus one year	Record of basis for admission or rejection, demonstrates justification of decision, statistical trend analysis, record of achievement for enrolled students	<b>(b) Contract:</b> Performance of a contract
Applications & Admissions spreadsheets	Indefinitely	Statistical trend analysis, resource and financial planning purposes	<b>(b) Contract:</b> Performance of a contract Legitimate
Financial support allocations data/letters/spreadsheets (scholarships, bursaries, financial awards)	Indefinitely	Statistical trend analysis, resource and financial planning purposes, historical record, record of achievement	Contract/Legitimate interest
Top-up funding application supporting materials	Recruitment cycle plus one year	Record of basis for decision, Resource and financial planning purposes	Contract
Admissions and Enrolment records on Student Records System, including data collected through registration process	Indefinitely	Historical archive, record of achievement, statistical trend analysis, Quality Assurance/benchmarking	Contract
Module choices	Indefinitely	Historical archive, programme monitoring/Quality Assurance	Contract
Assessment results/marks/assessment reports/progress reports/Board of Examiners letters/transcripts/certificates	Indefinitely	Historical archive, record of achievement, statistical trend analysis, Quality Assurance/benchmarking	Contract
Board of Examiners documentation (minutes, reports, chair's action, pass lists, penalties, irregularities)	Indefinitely	Historical archive, record of achievement, statistical trend analysis, Quality Assurance/benchmarking	Contract

Data	Retention period	Retention reason	Lawful basis
Assessment submissions	Indefinitely	Historical archive, programme monitoring/Quality Assurance	Contract
External examiners reports	Indefinitely	Historical archive, programme monitoring/Quality Assurance	Contract
Reasonable adjustments data relating to Learning Agreements	Duration of studies plus one year	To enable necessary adjustments to be made for assessments	<i>(Data owned by Student Services)</i>
Mitigating Circumstances	Duration of studies plus one year	To make adjustments appropriate to students' circumstances	Contract
Student Feedback	Indefinitely	Historical archive, programme monitoring/Quality Assurance	Contract
Exam/assessment schedules/recital programmes	Indefinitely	Historical archive, record of achievement, statistical trend analysis, Quality Assurance/benchmarking	Contract
External Specialist Examiners' claim forms received by email, including bank details	Printed, signed off and passed to Finance for payment.	Details need to be received via email from Student & attached as supporting documentation to the payment requests for verification purposes	
1-1 Student/Professor Allocations (PRIN)	Indefinitely	Historical archive, statistical trend analysis in terms of resource	Contract
Exchange Programmes – successful incoming students	Indefinitely	Record of basis for admission; Historical archive, record of achievement, statistical trend analysis, Quality Assurance/benchmarking	Contract

Data	Retention period	Retention reason	Lawful basis
Exchange Programmes – unsuccessful incoming students	Indefinitely	Historical archive, statistical analysis, benchmarking, monitoring widening participation, to demonstrate justification of decisions, to aid dispute resolution	Contract
Exchange Programmes – successful outgoing students’ and staff Erasmus grant records	Five years from the closure of the relevant grant agreement	European Commission requirement	Contract/legal obligation
Exchange Programmes – incoming and outgoing staff	Indefinitely	Historical archive, record of staff development, statistical trend analysis	Contract
UK Visas & Immigration (UKVI) for Students – core compliance documents and attendance record	One year from the date of end of sponsorship	Compliance with Home Office requirements	Contract/legal obligation
UKVI for students – documentation relating to immigration advice	Duration of studies plus six years	Compliance with the Code of Practice of the Office of the Immigration Services Commissioner (OISC)	Legal obligation
Complaints, appeals, misconduct	Indefinitely	Maintaining consistency, precedent for decisions, compliance with Office of the Independent Adjudicator for Higher Education (OIA) and Office for Students (OfS) regulations	Contract/Legal obligation

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## RCM Sparks

Data	Retention period	Retention reason	Lawful basis
Contact details of participants, including schools, who have booked tickets for RCM Sparks events (via the RCM Box Office) or requested to join the Sparks mailing list. Data retained on Spektrix.	5 years	To keep participants informed about relevant future events and for effective event management	6(1)(f) – Necessary for the purposes of legitimate interests pursued by the controller or a third party
Personal data from online registration forms. Data includes contact details, ethnicity, medical/SEN data, events activity/attendance, family relationships, access criteria, photo & video permissions, instrument/musical ability. Data transcribed from Wufoo to Paritor within a week of an event happening. Consent evidence attached to Paritor. Registration form deleted from Wufoo.	5 years	Effective and safe planning of events/projects/programmes. Annual and Access Agreement reporting. Retained in line with RCM archive/records management policy.	6(1)(a) – Consent of the data subject 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Personal data from paper registration forms. Data includes contact details, ethnicity, medical/SEN data, events activity/attendance, family relationships, access criteria, photo & video permissions, instrument/musical ability. Data transcribed into Paritor. Consent evidence uploaded to Paritor. Paper form shredded within two days of event	5 years	Effective and safe planning of events/projects/programmes. Annual and Access Agreement reporting. In line with RCM archive/records management policy.	6(1)(a) – Consent of the data subject 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)



Data	Retention period	Retention reason	Lawful basis
Registers for events including name, emergency contact details, DOB, medical/SEN data, instrument/level.	For the duration of an event	Safeguarding reasons during an event	6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person
Photos and videos	Permanent (archive)	In line with RCM archive/records management policy.	9(2)(a) – Explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Concert programmes (Springboard and Sparks Juniors)	Permanent (archive)	In line with RCM archive/records management policy.	6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest of a data subject or another person 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Other miscellaneous correspondence (email)	2 years	Effective and safe planning of events/projects/programmes.	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Payment (payroll) records	1 year	Reference documentation for queries.	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Data	Retention period	Retention reason	Lawful basis
Financial statements (accruals, prepayments and deferrals)	End of academic year + 1 year	Reference documentation for queries.	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Photos for ID cards (students/parents) (SPARKS Juniors)	End of academic year in which student leaves + 1 year	Safeguarding	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Student attendance records (absence lists, teacher registers, ensemble attendance)	Indefinitely	In line with RCM archive/records management policy.	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(i) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
ABRSM exam entries data	End of academic year in which student leaves + 1 year	To confirm exam entry status of individual JD student{s	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Expressions of Interest (including contact details, instrument, course & DBS number) from RCM Students	1 year	Effective planning of events/projects/programmes. Safeguarding	6(1)(a) – Consent of the data subject 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Data	Retention period	Retention reason	Lawful basis
Freelance workshop leaders' contact information	Indefinitely	Effective planning of events/projects/programmes	6(1)(a) – Consent of the data subject 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

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## Secretariat & Directorate

Data	Retention period	Retention reason	Lawful basis
Emails (email address)	Indefinitely	As a record of correspondence with this office and for follow up	(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
Visa reference letters (name, D.O.B, address)	Indefinitely	As a record of who has been supported by a visa application by the Director	(b) Contract: Performance of a contract
RE records	Indefinitely	Tracking event attendees	(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
Correspondence (letters) – G Drive and some hard copy	Indefinitely	For reference and record keeping (posterity related to PV correspondence)	(historical archiving)
Travel Insurance enquiries require names, DOB, address, nationality, signatures and/or medical history	Indefinitely	In case of any claims	(b) Contract: Performance of a contract
Emails/letters of complaints regarding catering, insurance or travel - hard copy, email and G Drive	Indefinitely	For reference in case of future queries	(b) Contract: Performance of a contract

Data	Retention period	Retention reason	Lawful basis
Details of health and safety incidents – both email and G Drive	Indefinitely	In case of any claims or need to refer in the future	(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
Any student details included in committee papers, meeting notes, etc.	Indefinitely	In accordance with the governance procedures of the College	(b) Contract: Performance of a contract
Photos of students used in newsletters	Indefinitely	Archive purposes	(a) Consent: The data subjects have given explicit consent to process their data.
Junior Fellow applications (successful)	Kept for the duration of the Junior Fellowship, plus 1 year	Historical archive, statistical analysis, benchmarking, monitoring widening participation	(b) Contract: Performance of a contract
Junior Fellow applications (unsuccessful)	Date of interview, plus 1 year	Kept in case of appeal	(b) Contract: Performance of a contract

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## Student Services

Data	Retention period	Retention reason	Lawful basis
Names and addresses of students	Indefinitely	We refer to the RCM database for this information.	<b>(b) Contract:</b> Performance of a contract
Email addresses of students/ incoming students that have signed up to accommodation	Until they ask to be removed from email listing (they are regularly reminded to let us know).	So that they can receive accommodation updates.	<b>(b) Contract:</b> Performance of a contract
Learning Agreements, diagnostic questionnaires and assessments and needs assessments for disabilities, case notes.	Securely destroyed 6 years after completion of studies.	In accordance with guidance from AMOSSHE	<b>(b) Contract:</b> Performance of a contract
Applications for student counselling; counselling notes.	7 years from date of first contract	In accordance with UKCP guidance	<b>(b) Contract:</b> Performance of a contract
Contact details of private landlords	4 years from last contact	Mirrors length of undergraduate degree and as recommended by University of London Housing Services	<b>(a) Consent:</b> the individual has given clear consent for you to process their personal data for a specific purpose.
Audition details of disabled applicants	1 year	In case of queries regarding audition arrangements	<b>(b) Contract:</b> Performance of a contract
Study Support Grant applications	1 year	In case of queries regarding applications	<b>a) Consent:</b> The data subjects have given explicit consent to process their data.

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## Studios

Data	Retention period	Retention reason	Lawful basis
Student recording agreements	Indefinitely	Use of Student Recordings for marketing purposes and to retain in the RCM Archive of Audio/Visual Concert Recordings	<b>(b) Contract:</b> Performance of a contract
Contact details – Email Addresses + Phone Numbers	Indefinitely	Liaising with clients on arrangements for Recording Sessions and to provide download links after any sessions take place.	<b>(b) Contract:</b> Performance of a contract
Student employee overtime, leave, timesheet records	Indefinitely	Records for budget keeping and analysis of student freelancer use for future financial planning.	<b>(b) Contract:</b> Performance of a contract
Financial records (budget sheets, invoice copies etc)	Indefinitely	Internal records, reference.	<b>(b) Contract:</b> Performance of a contract
Project Files and documentation (including video files)	Indefinitely	Use of Student Recordings for editing/marketing purposes and to retain in the RCM Archive of Audio/Visual Concert Recordings	<b>(b) Contract:</b> Performance of a contract

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## Vocal & Opera

Data	Retention period	Retention reason	Lawful basis
Names and addresses of students	Kept for one academic year and updated each year	Required for planning purposes – have all names in one place for ease of contact	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Student marks/ data about exams	Recruitment cycle plus one year	For staff to work on before sending to Registry and for use until final marks have been confirmed. Plus planning for students – check they are not repeating repertoire	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Competition results and comments sheets	Indefinitely	Historical archive/ record of achievement – these documents are not sent to Registry so this is the only record	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(i) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Student Biographies	Recruitment cycle plus one year	Used for all V+O project programmes and updated constantly.	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Staff Contact Details	Refreshed each academic year	Required for quick access to be able to contact a group of people	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract



Data	Retention period	Retention reason	Lawful basis
Invitation lists for operas/ events	Indefinitely unless individual has expressed they no longer wish to receive invitations	Inviting people to the productions	6(1)(f) Processing is necessary for your legitimate interests or the legitimate interests of a third party
Class Lists	Indefinitely	Historical archive, useful for planning, referring to in the future	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Leave of Absence Requests	Previous and current academic year	Record basis and justification of decisions/ planning purposes	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(i) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Measurements and Photos of students for costume	Recruitment cycle plus one year	Required for costuming students in productions	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Data	Retention period	Retention reason	Lawful basis
Allocation of rep coaches	Recruitment cycle plus one year	HoF – detail required for decisions	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Scholarship Information	Recruitment cycle plus one year	HoF – working document	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
References	Recruitment cycle plus one year	Historical archive, record of achievement, statistical trend analysis, Quality Assurance/benchmarking	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)

Data	Retention period	Retention reason	Lawful basis
Internal Audit Material/ comments	Recruitment cycle plus one year	Historical archive, record of achievement, statistical trend analysis, Quality Assurance/benchmarking	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Student Correspondence	Recruitment cycle plus one year	Historical archive, record of achievement, statistical trend analysis, Quality Assurance/benchmarking	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Staff related correspondence	Time	Ongoing prof development and mentoring	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Prospective staff info – expressing desire to work – they give permission	Indefinitely	Planning purposes for projects	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Data	Retention period	Retention reason	Lawful basis
College related meeting correspondence	Indefinitely	Archive of information to aid forward planning	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Development contacts and correspondence	For the duration of the relationship	Maintaining contacts for fundraising and student mentoring purposes	6(1)(f) Processing is necessary for your legitimate interests or the legitimate interests of a third party
Letters of agreement for visiting artistic teams/ details of fees	Indefinitely	Both historical archive and planning purposes	6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract 9(2)(j) – Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
Relationships with external companies	For the duration of the relationship	Maintaining contacts for student opportunities and collaborations	6(1)(f) Processing is necessary for your legitimate interests or the legitimate interests of a third party

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