



Records Management Policy

Business Area: Assurance Services

Version: 8.0

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Document Control

Document Version History

Date	Version	Author	Comments
12/07/2024	5.0		Baselined following approval by DPO
30/12/2024	5.1 <i>Draft</i>		Update to wording in Customer Data retention table
06/01/2025	5.2 <i>Draft</i>		Minor updates following dual review with DPO, Deputy DPO and Information Governance Assurance Officers
06/01/2025	6.0		Baselined following approval by DPO
	6.1 <i>Draft</i>		Updates to Appendix 1: Retention Table
	6.2 <i>Draft</i>		Minor updates following Legal Services review 1.2.2. Cautious risk statement updated following review by ERC
	6.3 <i>Draft</i>		Minor correction following review Updates to RACI table
05/01/2026	6.4 <i>Draft</i>		Updates to Appendix 1: Retention Table Note added for Customer Correspondence.
	7.0		Baselined following approval by DPO
03/07/2026	7.1 <i>Draft</i>		Updates to Appendix 1 The Customer Data Retention Table has been updated to incorporate Lifelong Learning Entitlement (LLE) retention requirements. Within Customer Data – Applications, record descriptions have been updated to align with record group descriptions. Generic Apply Service retention rules have been added to the Customer Data – Applications section. Additional notes have been included within the Customer Lifetime Record and Non-Repayable Funding Record sections. The Customer Data – Correspondence section has been updated, with records revised to reflect Time to Live (TTL) retention rules. Exceptions have been added for records created prior to the implementation of Lifelong Learning Entitlement retention rules. The Employee Data Retention Table has been repositioned to follow the Customer Data section. A new Strategy & Consulting Records category has been added to the Employee Data section.

			Updates have been applied to the Corporate Governance and Management – Partner Services section. Updates have been applied to the Corporate Governance and Management – Governance and Compliance section. A note has been added to the Financial Management section to clarify that the retention periods specified are minimum requirements. A new Vendor Management section has been added under Financial Management. A new Economic Crime section has been added under Financial Management. The Information Communication and Technology – Information Security section has been revised and replaced with updated records. Additional records have been added to the Information Communication and Technology – Infrastructure & Operations section. The Information Communication and Technology – System User Training and Support section has been removed.
	<i>7.2 Draft</i>		LS, JM, JB Review
	<i>7.3 Draft</i>		Major review and editorial redraft of the Records Management Policy. Structure, terminology and policy requirements updated to improve clarity and strengthen alignment with ISO 154489, The Section 46 Code of Practice and SLC information governance requirements. Introduced enhanced provisions for digital records management.
	<i>7.3 Draft</i>		Reference column added to Appendix 1 Content page added to Appendix 1 Further updates to Appendix 1 to improve customer readability DPO Team updates added
	<i>7. Draft</i>		Deputy DPO / ERC / Legal review RM added updates
	<i>7.5 Draft</i>		Version prepared for DPO Review RM added updates
	<i>8.0 Baseline</i>		DPO Approval

Review and Approval Register

Note: RACI = R- Responsible, A- Accountable, C-Consulted, I-Informed

Name	Position	RACI Role
Gary Womersley	Company Secretary/Head of Assurance Services (Data Protection Officer)	A
	Deputy Data Protection Officer/Information Assurance & Governance Senior Manager	R
	Information Assurance Governance Officer/Records Manager Lead Responsible person for this document.	R
	Senior Manager – Legal Services	C
	Enterprise Risk & Compliance	C

***NB: names of staff other than DPO have been removed under section 40(2) of the Freedom of Information Act 2000**

Update Schedule

This Records Management Policy (the “Policy”) will be reviewed biennially, or whenever business requirements, legislation, or regulations change.

Applicability

The requirements in this Policy apply to all permanent, temporary and contract workers employed or engaged by the Student Loans Company Limited (“SLC,” “we,” “us” and/or “our”) or any 3rd party organisations while at work or engaged on SLC business (collectively hereinafter referred to as “employee(s)”).

Compliance

- Any employee found to have violated this Policy could be subject to disciplinary action, up to and including termination of employment.
- At its sole discretion, SLC may require the removal from the service provision account of any employee of a 3rd party organisation contractually engaged on SLC business who is found to have violated this, Policy.

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1. Introduction

1.1 Purpose

1.1.1 The Student Loans Company Limited (SLC) recognises that information and records are valuable corporate assets. Effective records management is fundamental to the delivery of services, sound decision-making, accountability, transparency, and compliance with legal and regulatory obligations.

1.1.2 This Policy establishes SLC's commitment to the effective management of records throughout their lifecycle. It provides the framework for the creation, capture, storage, maintenance, retention, and disposal of records to ensure that information remains reliable, authentic, accessible, and secure for as long as it is required.

1.1.3 The objectives of this Policy are to ensure that SLC:

- Manages records consistently and effectively;
- Complies with legislative and regulatory obligations;
- Protects information assets from loss, misuse, destruction, unauthorised access, or inappropriate disclosure;
- Supports accountability, transparency, and audit requirements;
- Maintains evidence of decisions, actions, and business activities; and
- Preserves corporate memory and organisational knowledge.

1.2 Risk Appetite Alignment

1.2.1 The requirements outlined within this Policy support SLC's information governance framework and contribute to the effective management of legal, regulatory, operational, and reputational risks:

Level 1 Risk Category	Level 2 Risk Categories
Security	• Retention and disposal: risk of SLC data or information being compromised due to it being available or unavailable resulting in a retention or disposal issue.

1.2.2 Compliance with the Policy ensures that the retention and disposal of records are undertaken in a controlled and proportionate manner; aligned with SLC's approved risk appetite and regulatory obligations, which is:

- Overall, **Cautious** in relation to the retention and disposal of information and data (unless the nature/scope of the information/change requires an alternative risk-based approach).

1.3 Scope

1.3.1 This Policy applies to all records and information assets created, captured, stored, maintained, or processed by SLC in the conduct of its business activities, irrespective of format, location, or storage medium.

1.3.2 This includes, but is not limited to:

- electronic documents and records;
- email correspondence;
- databases and line-of business systems;
- scanned documents;
- paper records;
- audio and video recordings; and
- records held by third parties on behalf of SLC.

1.4 Statutory and Regulatory Environment

1.4.1 This policy supports compliance with all relevant legislation and guidance to records management and information governance including:

Data Protection and Information Rights

- UK General Data Protection Regulations/Data Protection Act 2018;
- Freedom of Information Act 2000
- Environmental Information Regulations 2004; and
- Privacy and Electronic Communications Regulations 2003

Records Management Standards and Guidance

- Public Records Act 1958;
- Section 46 Code of Practice on Records Management
- ISO 15489 Records Management; and
- Guidance issued by The National Archives and other relevant authorities.

2. Definitions and Policy Principles

2.1 Records Management

2.1.1 Records Management is the systematic and controlled management of records throughout their lifecycle, from creation or receipt through to retention and final disposal.

2.1.2 Effective records management ensures that information;

- Is reliable and trustworthy;
- Can be located when required;
- Remains accessible for legitimate business purposes;
- Is protected appropriately; and
- Is disposed of securely when no longer required.

2.2 Records Management Principles

2.2.1 SLC shall manage records in accordance with the following principles:

Accountability

- Clear ownership and responsibility shall exist for records throughout their lifecycle.

Integrity

- Records shall be maintained in a manner that preserves their authenticity, reliability, and evidential value

Accessibility

- Records shall be organised and maintained to ensure they can be located, retrieved, and used efficiently when required.

Security

- Records shall be protected against unauthorised access, alteration, disclosure, destruction, or loss.

Retention

- Records shall be retained only for as long as necessary to satisfy legal, regulatory, operational, and business requirements.

Disposal

- Records that have reached the end of their retention period shall be disposed of securely, appropriately and in accordance with approved retention schedules.

2.3 Definition of a Record

- 2.3.1 For the purposes of SLC, a record is any information created, captured, stored, or maintained as evidence of business activity, decisions/actions taken or transactions.
- 2.3.2 Records may exist in any format and may be retained for short-term, long-term, or permanent purposes depending on business, legal, or historical requirements.
- 2.3.3 Records provide evidence of organisational activity and support accountability, transparency, and corporate memory.

2.4 Digital Records

- 2.4.1 Digital records are records created, captured, stored, maintained, or accessed in electronic form. They are subject to the same legal, regulatory, and business requirements as physical records and must be managed throughout their lifecycle in accordance with this Policy.
- 2.4.2 Digital records may include; but are not limited to:
- electronic documents;
 - email correspondence;
 - instant messages and collaboration platform content;
 - records held within business applications and databases;
 - scanned documents and images;
 - audio and video recordings;
 - websites and online content; and
 - associated metadata
- 2.4.2 SLC shall ensure that digital records:
- remain authentic, reliable, complete, and accessible throughout their lifecycle;
 - are stored within approved corporate systems and repositories;
 - are protected against unauthorised access, alteration, disclosure, deletion, or loss;
 - are appropriately classified and managed in accordance with information governance requirements;
 - can be identified, retrieved, and produced when required for operational, legal, regulatory or audit purposes; and
 - are retained and disposed of in accordance with approved retention schedules and disposal procedures.

- 2.4.3 Employees must ensure that records of corporate value are not maintained solely within personal drives, SharePoint sites, mailboxes, removable media, or other locations that are not subject to appropriate organisational controls. Records must be captured within approved systems that support governance, security, retention, and retrieval requirements.
- 2.4.4 Where new technologies, applications or information systems are introduced, records management requirements shall be considered throughout procurement, design, implementation, maintenance, and decommissioning activities. The migration, transfer, or conversion of digital records between systems must preserve their authenticity, integrity, usability, and evidential value.
- 2.4.5 Digital records should be regarded as SLC's primary record unless there is a legal, regulatory, operational, or business requirement to retain a physical equivalent. Where physical records are required, they must be managed in accordance with the same records management principles and controls that apply to digital records.
- 2.4.6 SLC will seek to maximise the use of digital technologies and information management solutions to improve the creation, management, retention, discovery, and disposal of records, while ensuring information remains secure, accessible, and appropriately governed.

3. Record Retention

- 3.1.1 SLC shall maintain a documented retention schedule to ensure that records are retained for appropriate periods and disposed of in a controlled and consistent manner.
- 3.1.2 Retention Periods shall be determined with reference to:
- Statutory and regulatory obligations;
 - Operational requirements;
 - Business needs;
 - Contractual obligations; and
 - Evidential or historical value.
- 3.1.3 Records shall not be retained indefinitely unless there is a clear legal, regulatory, operational, or historical justification for doing so.
- 3.1.4 Where records are subject to litigation, investigation, audit activity, fraud activity, freedom of information requests or other legal obligations, disposal shall be suspended until appropriate authorisation is provided.

- 3.1.5 Records that have reached the end of their retention period shall be securely destroyed or deleted in accordance with approved procedures. Disposal activities shall be capable of demonstrating appropriate governance and accountability.

Appendix 1 provides the approved retention periods for the principal categories of information maintained by SLC.

4. Related Documents

This Policy should be read in conjunction with supporting policies, standards, procedures, and guidance relating:

Document Description
Data Protection Policy;
Freedom of Information Policy;
Information Security;
Information Asset Management;
Records Retention and Disposal;
Freedom of Information; and
Business Continuity and Risk Management

SLC must ensure that customer data is retained in line with a range of regulatory and business requirements. For example:

- student support legislation obliges SLC to take into account any previous supported study to accurately determine an individual's entitlement to student support for any further study; and
- student finance eligibility criteria requires that there are no arrears with any previous student loans.

In some circumstances (e.g., for specific training or reporting purposes) we may anonymise or pseudonymise your personal data so that it can no longer be associated with you, in which case we may use such data without giving you any further notice.

When you take out a student loan, it's likely that you will be making repayments towards it for several years after you have finished or left your course. This means that SLC will hold on to the majority of your data until you have repaid your loan in full or it's been cancelled.

Our Records Management Policy involves key stages where data we hold on a customer's record can be reduced through data minimisation/erasure activity. For example, six years after a customer has finished or left their course, or six years after a customer has fully paid off their loan. After a customer has received some non-repayable funding or has fully paid off their loan, we'll continue to hold a reduced amount of data on the customer, in the form of a 'Lifetime' record, ensuring that we're only holding the necessary amount of data to fulfil our Regulatory obligations under our Public Task and no more. A customer's Lifetime record is normally held until 70 years after their date of birth, when it will be fully erased from our systems.

SLC currently retains some historic data due to the limitations of some of its legacy information technology systems. SLC has an ongoing data minimisation/erasure programme in place which continually reviews retention requirements within our systems. This is being actioned in advance of a permanent strategic solution being delivered and SLC being able to minimise/erase all relevant data sets within all systems.

You have a right to request access to your personal data by making a [Data Subject Access Request \("DSAR"\)](#). You have a range of specific rights that you can exercise under UK data protection legislation, find out more in our [Data Subject Rights](#) factsheet.

The table below contains both the maximum and minimum retention periods for the main categories of data held by SLC.

Appendix 1 Retention Table

Table 1 – Customer Data Records for Customers with Lifelong Learning Entitlement Products / Funding.....	15
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Table 1: Customer Data Records for Customers with Lifelong Learning Entitlement Products / Funding

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.APPL	Where applications are lapsed/abandoned, or no funding is provided	Applicant Core Record Bank Account Details, Consents Customer Application Record Application Information, Application Evidence, Partner/Spouse Details, Dependents Details, Dependents Evidence, Income/Outgoing Details, Income Evidence, Special Support Details, Special Support Evidence Health Information Medical: Details, Evidence, Data Sharing Consents, Repayments, Evidence/Declarations (Repayments) Eligibility/Entitlement Assessment SLC Entitlement & Eligibility Assessment Decisions, Change of Circumstances Assessment, Record of Re-Assessments, Evidence of Changes of Circumstances for a Customer, Transfer/Suspension/Withdrawal: of Studies Records, Studies Evidence,	Submission of an LLE Course Application	End of Service Year plus one Course Year (12 months)

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.APPL	Where applications are lapsed/abandoned, or no funding is provided	Studies Evidence specific to repayments phase. Customer Account, Correspondence & Supporting Information Correspondence specific to a student's product/service. Customer Engagement Record. Customer Information Provided to/from Third Parties Information provided to/from a third party in relation to student application for funding. Correspondence with third party specific to a customer account. Sponsor Information (e.g. Parent/Guardian/Partner/Associated Party) Information & Supporting Documentation for Applicants Application Information specific to the parents/guardians/partners/associated parties: Location Information, Contact Information, Income Details Voluntary Statistical Data	Submission of an LLE Course Application	End of Service Year plus the End of Course Year (12 months)

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.APPL	Where applications are lapsed/abandoned, or no funding is provided	Voluntary questions (Equal Opportunities Monitoring) Payment & Fraud Investigations Local Operational Fraud & Payment Investigations	Submission of an LLE Course Application	End of Service Year plus one Course Year (12 months)
<u>Exceptions</u> (These may vary by product) No Application or Customer data will be deleted where: • The Customer is identified as a suspected or confirmed fraud case • The Customer is on the Financial Sanctions list. • The Customer has any open *Complaint, or a Stage 1 or 2 Complaint which was closed in the last 2 years. • Any complaints have gone to the Independent Assessor which have been closed in the last 10 years. • The Customer has any open *Appeal, or a Stage 1 or Stage 2 Appeal which was closed in the last 6 years + 6 months. • Any Appeals that have gone to the Independent Assessor which have been closed in the last 10 years. • Any financial transaction has been recorded for that Customer which can't be attributed to a specific Application. • The Student Awards Agency Scotland (SAAS) have not completed a reconciliation exercise for Fee Loans for that Academic Year. *The Complaints and Appeals exceptions will also include; Instances of Court proceedings where the Customer may not have come directly to SLC first (e.g. pre-action Protocols and Judicial Reviews), Instances where the Customer has escalated their Complaint/Appeal to an Independent Assessor or on to the relevant Ombudsman. If the Customer has no Applications, they will be deleted where: Student (only) – The Student registered on SLC 12 (or more) months ago.				

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.APPL	Generic Apply Service Applies to all online application data that is given a time to live from application to submission	• Incomplete Applications • Submitted Applications • Cancelled Applications • Application Audit Data	From application creation date	18 Months 6 Months 44 Days 3 Years
CF.CLR	Customer Lifetime Record Records are retained for the retention period with or without a payment being made. <i>For most records, only the outcome of the check, status, and enquiry is retained.</i> The Customer Lifetime Record does not apply where we have a confirmed notification of a customer being deceased.	• Tuition Fee Loan Balance (with or without payment) • Personal Information (e.g. first name, surname, date of birth, town of birth, gender, nationality) • Identification Number (e.g. National Insurance Number) • Location Information (Current and some Historical) • Contact Information (Current) • University/College Course Details • Student Finance Applications & Products Received • Applications/Product Status • Education Provider (University/College) Location • Online Account Details • Declaration (signed/online) • Identification Information (e.g. Passport check only) • Identity Evidence • Location Evidence • Marital Evidence	From Record Creation	70 Years (from date of birth)

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CLR	Customer Lifetime Record	- Nationality Evidence - Residency Evidence - Armed Forces Data Evidence - Compelling Personal Reasons Record - Compelling Personal Reasons Evidence	From Record Creation	70 Years (from date of birth)
		Consent to Share Records	From Record Creation	70 years (from date of birth) (but where no payment is made, this will be deleted after 6 or 12 months depending on the product)

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CRRF	Customer Repayable Funding Record	Customer Core Record - Location Information (historical) *Contact Information (historical) - Bank Account Details (current & historical)	Loan Repayment / Loan Write-Off	6 Years *a rolling history of contact details is deleted at 6-Years end of period of study
		HMPO Passport check for returned postcode and country of birth.	From point of submission	18 months
		Customer Application Record - Application Information - Application Evidence - Partner/Spouse Details - Dependents Details - Dependents Evidence - Income/Outgoing Details - Income Evidence - Special Support Details - Special Support Evidence - Application Evidence	End of Period of Study	6 Years
		Validation of Household Income (income checks undertaken by information being sent to HMRC)	From last updated date/time	6 months
		Health Information - Medical Details (Application) - Medical Evidence (Application) - Medical Data Sharing Consents	End of Period of Study	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CRRF	Customer Repayable Funding Record	• Medical Details (Repayments) • Medical Evidence/Declarations (Repayments) • Deceased Notification Record Eligibility / Entitlement Assessment • SLC Entitlement & Eligibility Assessment Decisions • Change of Circumstances Assessment	Loan Repayment / Loan Write-Off	6 Years
		• Evidence of Changes of Circumstances for a Customer • Transfer/Suspension/Withdrawal of Studies Records • Transfer/Suspension/Withdrawal of Studies Evidence	End of Period of Study	6 Years
		• Transfer/Suspension/Withdrawal of Studies Evidence (Specific to Repayments Phase)	Loan Repayment / Loan Write-Off	6 Years
		Customer Account, Correspondence & Supporting Information • Correspondence specific to a student's product/service • Customer Engagement Record	End of Period of Study	6 Years
		• Correspondence specific to a student's product/service (Operational)	Last Modified / Processed Date	2 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CRRF	Customer Repayable Funding Record	Customer Information Provided to/from Third Parties - Information provided to/from a third party in relation to student application for funding - Correspondence with third party specific to a customer account - Repayment of information specific to Customer Accounts - Correspondence with Government Agencies specific to customer accounts	End of Period of Study	6 Years
			Date of issue/transaction	6 Years
			Loan Repayment / Loan Write-Off	6 Years
			Last Modified / Processed Date	2 Years
		Financial Transactions & Payment Information (Customer Specific) - Financial / Transactional Repayment Records - Repayment Evidence	Loan Repayment / Loan Write-Off	6 Years
		Loan Sales Records (Customer Specific) - Records generated in the development of Loan Sales - Records created in the production of reporting for investors	Last Modified / Processed Date	40 Years
		Repayment/Deferment/Write-Off Artefacts - Customer Maintenance Records - Customer Maintenance Evidence	Loan Repayment / Loan Write-Off	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CRRF	Customer Repayable Funding Record	- Change of Circumstances Records (Repayments) - Records for Customers who are permanently unable to work - Evidence for Customers who are permanently unable to work - Repayable funding artefacts associated to finalisation of loan repayment or loan write-off	Loan Repayment / Loan Write-Off	6 Years
		Operational Artefacts Repayable funding operational documents and artefacts	Last Modified / Last Processed Date	2 Years
		Voluntary Statistical Data Voluntary questions (equal opportunities monitoring)	Loan Repayment / Loan Write-Off	6 Years
		Payment & Fraud Investigation Local operational fraud and payment investigations	Closure of case	6 Years
		Customer Reporting - Performance Reports - Trend Analysis Data - Complaint Reporting	Last Modified / Process Date	10 Years 6 Years 6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CRNR	Customer Non-Repayable Funding Record Records relating to non-repayable funding will be in scope for deletion 6-years after the end of the customer's period of study, where the customer holds only non-repayable funding products and no repayable loan products.	Customer Core Record - Location Information (historical) - Bank Account Details (current & historical)	End of Period of Study	6 Years
		Customer Application Record - Application Information - Application Evidence - Partner/Spouse Details - Dependents Details - Dependents Evidence - Income/Outgoing Details - Special Support Details - Special Support Evidence - Customers holding FE Education Maintenance Allowance Products	End of Period of Study	6 Years
		HMRC Validation of Household Income checks	From last updated date/time	6 months
		Health Information - Medical Details - Medical Evidence - Medical Data Sharing Consents - Medical Evidence/Declarations - Deceased Notification Record	End of Period of Study	6 Years
		Eligibility/Entitlement Assessment SLC Needs Assessment/Entitlement & Eligibility Decision Records	End of Period of Study	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CRNR	Customer Non-Repayable Funding Record	- SLC Re-assessment, Change of Circumstances Assessment, Record of re-assessments decisions - Evidence of Changes of Circumstances for a Customer - Transfer/Suspension/Withdrawal of Studies Records - Transfer/Suspension/Withdrawal of Studies Evidence	End of Period of Study	6 Years
		Customer Account, Engagement & Supporting Information Customer Engagement Record	End of Period of Study	6 Years
		Customer Information Provided to/from Third Parties - Information provided to/from a third party in relation to student application for funding - Correspondence with third party specific to a customer account - Purchase Orders, Timesheets, and invoices issued to/received from third parties	End of Period of Study	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CRNR	Customer Non-Repayable Funding Record	Financial Transactions and Payment Information (Customer Specific) - Claims records and notifications *Financial / transaction records	End of Period of Study	6 Years *System discrepancy applies
		Service Provisions for Customer Records associated to the setup of services on behalf of customers	End of Period of Study	6 Years
		Operational Artefacts Non-repayable funding operational documents and artefacts	Last Modified / Processed Date	2 Years
		Payment & Fraud Investigations Local Operational Fraud and Payment Investigations	Last Modified / Processed Date	2 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.PGPA	Sponsors (e.g. Parent, Guardian, Partner, Associated Party, Additional Contacts)	When there is a payment against a record (customer returning as a sponsor) • Personal Information • Location Information • Contact Information (current) • Relationship Status • Relationship Evidence • Online Account Details • National Insurance Number	From Record Creation	70 Years (from date of birth)
		When there is no payment against a record (Sponsor only) • Personal Information • Location Information • Contact Information (current) • Relationship Status • Relationship Evidence • Online Account Details	End of Period of Study	6 Years
		Where there is no payment against a record (customer returning as a Sponsor) • National Insurance Number • Financial Information • Financial Information Evidence	End of Period of Study	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.PGPA	Sponsors (e.g. Parent, Guardian, Partner, Associated Party, Additional Contacts)	- Child Dependants Personal Information - Child Dependants Income - Child Dependants Education Status - Child Dependants Education Details - Declaration (full name, signature, date of declaration)	End of Period of Study	6 Years
		Consent to Share Record - Consent to Share (third party individual details) - Consent to Share evidence/instructions - Consent to Share third party company details - Customer approval of consent to share	Loan Repayment / Loan Write-Off	6 Years
		Power of Attorney Records - Power of Attorney Record - Power of Attorney evidence/instruction	Loan Repayment / Loan Write-Off	6 Years
		Additional / Alternative Contacts Record of Additional / Alternative Contacts	Loan Repayment / Loan Write-Off	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.APPE	Appeals Records	Operational Artefacts Parent / Guardian / Partner / Associated Party operational documents and artefacts	Last Modified / Last Processed Date	2 Years
		Appeals Case Files - Appeals Submissions - Stage 1 case files - Stage 2 case files - Independent Assessor case files - Appeals correspondence - Operational Artefacts	Closure of case	6 Years + 6 Months
		Operational Artefacts	Closure of Application or Case	6 Years + 6 Months
		Complaints & Feedback Case Files - Initial complaints and feedback submissions - Complaint case files (stage 1) - Complaint case files (stage 2) - Complaints operational documents and artefacts	Closure of the Case / Complaint	2 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CCRF	Customer Complaints, Research & Feedback	Customer Research (Customer Specific) - Online Surveys - External Research Agency Projects	Closure of Survey Closure of Research Project Last Modified / Processed Date	3 Years 1 Year 2 Years
		- Non-Contact Lists - Satisfaction Tracking Research - Customer Request for Contact - Phone Records (Research) - Internal Research Project Data	Closure of Research Project	3 Years
		Customer Research (Unattributable / Anonymous) - External Research Agency - Online Journey Research	Closure of Research Project	3 Years
		Customer complaints, research and feedback operational documents and artefacts	Closure of Research Project	2 Years
CF.COFR	Counter Fraud Records	Case Files - Standard Counter Fraud Case Files - Counter Fraud Industry Data Sharing Records - Identification evidence artefacts	Closure of the case / complaint	6 Years
		Serious Counter Fraud Case Files	Creation of case	70 Years (from date of birth)
		Counter Fraud operational documents and artefacts	Completion of application processing	2 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CORR	Correspondence	System Correspondence (Outbound and Inbound Communication)	From point of creation	1 Year
		• Low-risk operational documents	From point of creation	7 Years
		• Medium Low-risk communication documents	Loan Repayment / Loan Write-Off	6 Years
		• High-risk communication documents	Date call made delivered	2 Years
		• Telephone call records	From last transaction	2 Years
		• Social Media records		
		Customer Specific Correspondence	Last Modified / Processed Date	6 Years
		• Emails between different parts of SLC that contain personal information		
		• Emails (standard)	Last Modified / Processed Date	6 Years
		• Emails (Executive Leadership Team and Company Secretary)	Last Modified / Processed Date	10 Years

Table 2: Customer Data Records for Customers without Lifelong Learning Products / Funding (as Table 1, with the following exceptions)

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.APPL NON-LLE	Where applications are lapsed/abandoned, or no funding is provided	As Table 1 for: • Applicant Core Record • Customer Application Record • Health Information • Eligibility/Entitlement Assessment • Customer Account, Correspondence & Supporting Information • Customer Information Provided to/from Third Parties • Sponsor Information (e.g. Parent/Guardian/Partner/Associated Party) Information & Supporting Documentation for Applicants	Between 12 and 24 months from either the: • Start date of the Academic Year • Start date of the last year of the course • End date of the entire course	6 or 12 months depending on the type of funding, product, and status of the Application. Exceptions as per Table 1
CF.CLR NON-LLE	Customer Lifetime Record	Applicant Core Record • Personal Information (e.g. first name, surname, date of birth, town of birth, gender, nationality) • Identification Number (National Insurance Number) • Identification Information (Passport check only) • Identity / Location / Marital Evidence	Between 12 and 24 months from either the: • Start date of the Academic Year • Start date of the last year of the course • End date of the entire course	6 or 12 months depending on the type of funding, product, and status of the Application. Exceptions as per Table 1

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<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CLR NON-LLE	Customer Lifetime Record	• Location Information • Contact Information • University/College Course Details • Student Finance Applications & Products received • Applications/Product Status • Education Provider (University/College) Location • Online Account Details • Declaration (signed/online) • Nationality / Residency Evidence • Armed Forces Data / Evidence Eligibility/Entitlement Assessment • Compelling Personal Reasons Record • Compelling Personal Reasons Evidence	Between 12 and 24 months from either the: • Start date of the Academic Year • Start date of the last year of the course • End date of the entire course	6 or 12 months depending on the type of funding, product, and status of the Application. Exceptions as per Table 1
CF.PGPA NON-LLE	Sponsors (e.g. Parent, Guardian, Partner, Associated Party, Additional Contacts)	Core Record • Personal Information • Location Information • Contact Information • Relationship Status • Relationship Evidence • Online Account Details Financial Information • National Insurance Number	End of Period of Study	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CF.CRMS NON-LLE	Mortgage Style Loans (MSL) Record	• Core Customer Record • Customer Application(s) Record • Financial Transactions & Payment Information (Customer Specific) • Deferments • Engagement with MSL Owners • Repayment/Write-Off Records	Loan Repayment / Loan Write-Off	6 Years
		• Mortgage Style Loan Operational Artefacts and Documents	Last modified / processed date	2 Years

Table 3: Employee Data Records (Permanent & Fixed Term)

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
HR.EMPL	Unsuccessful Recruitment Candidates	Personal Information	Last action on the applicant file	2 Years
		Application Forms & Supporting Documentation	Last action on the applicant file	2 Years
		Recruitment Vetting & Criminal Convictions	Last action on the applicant file	12 Months
		Identification Documents	Last action on the applicant file	3 Months
	Successful Recruitment Candidates	Personal Information	Last action on the applicant file	6 Years
		Application Forms & Supporting Documentation	Last action on the applicant file	2 Years
		Recruitment Vetting & Criminal Convictions	End of Employment	6 Years
		Identification Documents (including Identification Documents of Foreign Nationals (ensuing from obligations to retain copies of documents used to perform immigration checks)).	End of Employment	6 Years
	Employee Records	Employee Personal Details	End of Employment	6 Years
		3 rd Party Emergency Contact Details provided by employee	End of Employment	6 Years
		Bank Account Details	End of Employment	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
HR.EMPL	Employee Records	Additional Personal Details (e.g., Religion, Ethnicity, Disabilities, Gender Identity)	End of Employment	6 Years
	Employment File	Written Particulars of Employment	End of Employment	6 Years
		Personal Payroll History/Salary records (including record of pay, performance pay, overtime pay, allowances, pay enhancements, other taxable allowances, payment for untaken leave, reduced pay, maternity leave)	The end of the assessment tax/period to which the payments relate	6 Years
		Pensions Records	Date of Birth	100 Years
		Expenses Records	The end of the assessment tax/period to which the payments relate	6 Years
		Appraisals/Assessments	End of Employment	6 Years
		Annual Leave Records	End of Employment	6 Years
		Unpaid Leave Periods (Records of Maternity, Paternity, Adoption or Sick Leave)	Date of Birth	100 Years
		Statutory Maternity Pay Document	The end of the tax year in which the maternity pay period ends	6 Years
		Complete Sickness Absences Record showing dates and causes of sick leave	End of Employment	6 Years
		Medical/Self Certificates	End of Employment	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
HR.EMPL	Employment File	Health Referrals (including medical reports from doctors/consultants)	End of Employment	6 Years
		Health & Safety Records	The end of financial year to which the records relate	6 Years
		Death Benefit Nomination & Revocation Forms	From Leaving Employment	6 Years
		Staff Security Vetting Records	From Leaving Employment	6 Years
		Employee Training Records	From Leaving Employment	6 Years
		Employee Grievance Records	From Leaving Employment	6 Years
		Working Time Records	The end of the financial year to which the records relate	6 Years
		Employee Discipline Records	From Leaving Employment	6 Years
		Job History	From Leaving Employment	6 Years
		Redeployment, Redundancy & TUPE	From Leaving Employment	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
HR.EMPL	Contingent Workers	Contingent Worker Record (name, address, contact details)	End of Employment	6 Years
	HR Operational Records	HR Operational Records	Last Modified Date	2 Years
	HR Strategy & Consulting	Minutes of Meetings, Correspondence, People change projects, PCS Trade Union consultation	Date of last paper	6 Years

Table 4: Corporate, Management and Governance Records

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CG.CSEC	Statutory Books, Registers and Constitutional Records	- Incorporation documents - Companies House Correspondence - Companies House Filings - Company Books and Registers	Date of most recent document	Permanent (Life of Company)
		Gifts and Hospitality Register	End of Financial Year	10 Years
CG.BOAR	SLC Board	Board Effectiveness working papers	Date of most recent document	10 Years
		Board Schedule	Date of most recent document	5 Years
		Board Minutes of Meetings (incl. versions for publication)	Date of last action	Permanent
		Various working papers (Board Reporting Protocols)	Date of most recent document	10 Years
	Board Member Information	Board Member Details including Letters of appointment, delegations, contact details, letters of indemnity, registers of interests, induction paperwork, files and advice, skills, and assessment.	After end of appointment/employment	6 Years
CG.GREC	Operational and Business Administration	- Policies and Procedures - Policy Specifications	When updated/superseded	6 Years after superseded

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CG.GREC	Operational and Business Administration	Operational Business Information (General administrative records, routine administrative correspondence (not related to customer, contract, or legal matters))	Date of most recent document	2 Years
		Letters of Financial Delegated Authority	End of Financial Year to which the records relate	7 Years
		Annual Performance and Resource Agreement (APRA)	End of Financial Year to which the records relate	7 Years
		All other Corporate Management and Governance Records	Date of most recent document or last action in most cases	6 Years (Some records, e.g. Framework Documents and External Reports are kept permanently)
CG.PPER	Planning and Performance	- Corporate and Business Plans - Annual Report and Accounts - Performance Reports - Management Information	Financial Year End	7 Years
CG.AUDI	Audit	Audit Reports and Report Papers	From issue date	6 Years
		Interim Audit Reports, Correspondence, and Internal Audit Guides	From issue /correspondence date	3 Years
CG.PROJ	Projects	General projects (incl. project documentation, financial documents, project proposals, feasibility studies, plans, and specifications)	Completion of Project / date of last paper	6 Years (Major projects determined by their nature can be retained for longer up to 25 years)

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CG.LEGL	Legal Affairs	Provision of legal advice not specific to an individual case (etc. Legal advice given to SLC concerning legislation or proposals for new legislation affecting its conduct and business) Includes legal advice for projects, contracts, policy and in relation to a dispute.	Date of advice	7 Years
	Procurements and Contracts	Tenders, Contracts and Agreements	End of Contract	6 Years
		Settlement Agreements with ex-employees	Date of Agreement	6 Years
		Non-Disclosure Agreements	Date Non-Disclosure Agreement ceases to have effect (NB – may be indefinite)	6 Years
	Litigation	• Employment Tribunal Records • Civil Court Litigation	Date file closed (which will not be earlier than appeal deadline)	6 Years
	Intellectual Property	Branding and intellectual property (including trade/service marks)	Date modified	Life of Company
	Commercial Property	All documents relating to SLC's property portfolio	Date deed is superseded in full or terminated	6 Years
		Land and Buildings Transaction Tax (LBTT) Returns to Revenue Scotland	Date relevant lease ceases to apply	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CG.LEGL	Access to Information (Information about Freedom of Information, Data Subject Access Requests, and the Publication Scheme)	Procedures for handling FOI requests and other documents regarding implementation of FOI; Procedure and Policy, case file records which lead to the development or precedent or best practice	When updated or superseded	6 Years
		Case file records detailing FOI requests and responses, consideration of exemptions, and subject internal reviews and appeals. Each case record is likely to contain personal data as defined in UK data protection legislation. Specifically, each record is likely to contain: - the name, address, and other contact information of the applicant - personal details provided by the applicant when making his/her request - where a fee has been paid, bank account and other payment details - all personal data will be handled with care and in accordance with UK data protection legislation. Access to personal data will be strictly controlled.	From date of release	6 Years
		Data Protection “Rights of Data Subject” records – to include Subject Access and Data Portability requests, requests for erasure, rectification, restriction, objection. Includes initial request, response, related	Completion of Request	2 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CG.LEGL	Access to Information	correspondence, and other supporting documentation	Completion of Request	2 Years
		Statistical data about number of FOI requests and Data Subject Access requests. Includes the timeliness of responses, outcomes, internal reviews and appeals and management information	Current Year	10 Years
		Details of what access decisions have been taken about SLC records and redacted versions of documents that were released	Current Year	10 Years
		Information subject to a FOI request but scheduled for destruction	Last date of correspondence	6 Months
		Publication Scheme published on the SLC website	When updated/superseded	5 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CG. RISK	Risk Management	Audit Risk Committee Risk Report and Dashboard.	Date superseded	5 Years
		Database containing all of SLCs historic and current Corporate Risks and issues	End Date	6 Years
CG.ESTM	Business Continuity	- Business Impact Analysis - Business Continuity Plans - Post-exercise / post incident reports - Supplier review	At the start of each year	5 Years
	Print and Mail Services	- Memorandum of Understandings - Service Level Agreements - Licence Agreements	End of the Agreement or Contract	6 Years
	Health and Safety	Risk Assessment documents for all sites listing hazards or hazardous events and the actions and controls in place to manage these	Updated annually or if/when a change is required	6 Years
		Health & Safety Committee Meeting Minutes	Quarterly when document created	5 Years
		CCTV capture and door access records	Date of capture/record	Up to 90 days
CG. PRSK	Partner Services and External Engagement	Includes documentation but not limited to minutes of meetings, agendas, presentations, data capture forms, satisfaction surveys, all communications, performance review reports, analytical data,	Creation of document	When no longer required / Superseded

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CG. PRSK	Partner Services and External Engagement	audit reports, guidance, factsheets, web service/online content.	Creation of document	When no longer required / Superseded
		• Memorandum of Understanding • Bursary Contracts • Service agreements and contracts • GDPR Agreements	End of Agreement / Contract	6 Years
CG.CORP	Corporate Communications	Digital and Online Communications • Website Content (web pages, social media posts, downloadable content, online guides, factsheets, videos, and multimedia content)	Date superseded, withdrawn or removed from publication	6 Years
		Communications Campaigns Records • Campaigns materials including web adverts and emails	Campaign Closure	6 Years
		Publications and Presentations • Corporate Affairs publications and presentations, guidance documents, information packs, printed and electronic publications.	Date Superseded	6 Years
		Media Relations and Press Activity • Press releases, media statements, press enquiries, journalistic correspondence, press monitoring, media briefings	Closure of activity or publication date	6 Years
		• Handbooks and guides to media/public relations	Date Superseded or removed from publication	6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CG.CORP	Corporate Communications	Internal Communications Staff communications, staff announcements, newsletters, intranet content, employee engagement communications, staff briefings.	Date Superseded or removed from publication.	3 Years
		Brand Management and Marketing Intelligence Corporate identity guidelines, logos, templates, imagery, photography	Date Superseded or removed from publication	6 Years
		Customer insight reports, market research, campaign analysis.	Date Superseded or completion of activity	6 Years
CG.GOVC	Governance and Compliance (Compliance Framework, Data Protection Management, Records Management, Data Governance, Knowledge Management, Security Education Awareness Management)	Emails and reference documents on various topics	Last modified/processed date	6 Years
		Compliance Framework populated artefacts and compliance records.	From start of control framework cycle	6 Years
		Artefacts including trackers, logs, registers, documents, handbooks, manuals, process documents, and flow charts	When updated/superseded	6 Years
		All other populated artefacts and compliance records	Last modified/processed date	10 Years
		Data Protection Case Files	Closure/Date of Last Action	6 Years (then reviewed for cases of interest)
		Data Protection mandatory artefacts	When updated/superseded	Permanent
		Data Protection mandatory artefacts	When updated/superseded	Permanent

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
CG.GOVC	Governance and Compliance	Records Management mandatory artefacts including Retention Schedules	When updated/superseded	Permanent
		Information Asset Registers	When updated/superseded	6 Years
		Statistics and Management Information including information packs and dashboards	Last modified/processed date	Up to 6 Years
CG.CLOI	Independent Assessor	Customer Files	Date case assigned to an Independent Assessor	6 Years
		Ombudsman Reports	Date report received from Parliamentary and Health Services Ombudsman	6 Years
		Customer Recordings	Date case assigned to an Independent Assessor	6 Years
		Contact Information	Date Independent Assessor assigned to role	11 Years

Table 5: Financial Management Records

(All retention periods for financial management are minimum thresholds. Records are retained for at least the specified duration and may be held longer where required to meet legal, regulatory, audit or operational obligations)

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
FM.ACRE	Accounting Records	- Bank Account Records - Financial Statements and Summaries - Management and Project Account Forecast Reports	End of the financial year to which the records relate.	6 + 1 Year
FM.TRMA	Transaction Records	Record of cheques drawn for payment	End of the financial year to which the records relate.	6 + 1 Year
		General and subsidiary ledgers	End of the financial year to which the records relate.	6 + 1 Year
		Financial transactions – for potential audit requests and historical reconciliation differences	End of the financial year to which the records relate.	6 + 1 Year
		Operational Records	Last modified or processed date	2 Years
		Sanction Records	When added to Sanctions List	Indefinite – until removed from Sanctions List
		Money Laundering Reporting Officer (MRLO) forms and Investigation log	When referral email to MRLO received	40 + 6 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
FM.EFIN	Employee Financial Records	Payroll Records (e.g. salary ledger card records, staff financial information for budgeting and forecasting) Payroll Records	End of the financial year to which the records relate	6 + 1 Year
FM.ASEQ	Assets and Equipment	Asset and Equipment Registers	End of the financial year to which the records relate	6 + 1 Year
FM.PROC.02	Vendor Management	Vendor Management Artefacts	End of Employment / Tax Year	6 Years
FM.CRPR	Economic Crime (Internal & External Threat)	Information, Trends & Analysis, i.e. Fraud figures and volumes, trends, analysis, business documentation	Creation of Case	40 Years

Table 6: Information Communication and Technology Records

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
IT.ISEC	Information Security	Information Security Incident Management Artefacts including Project Management Artefacts, Risk Assessments, Risk Reviews, Data Transfer Authorisations	Last Action on File	6 Years
		Information Security Risk Management Artefacts including Project Management Artefacts, Risk Assessments, Risk Reviews, Data Transfer Authorisations	Last Action on File	6 Years
		Security Architecture & Engineering: - Log Files - Database backups - Architectural Design Artefacts	Last Action on File Post Decommission of a System Post Decommission of a System	6 Years Lifetime of the System / 6 Years Post Decommission Lifetime of the System / 6 Years Post Decommission
		Security Governance Artefacts (Policies, Standards, Procedures and Process documentation, Decision Records, Internal Audit Records, Security Architectural Design Artefacts,	Post Decommission of a System	Lifetime of System / 6 Years Post Decommission
		Security Executive Reporting	When Updated or Superseded	Permanent
		Vulnerability Management: - Pen Testing Artefacts - Pen Testing Reports	Last Action on File Post Decommission of a System	6 Years Lifetime of the System / 6 Years Post Decommission

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
IT.ISEC	Information Security	Security Assurance Management:	Last modified/processed date	6 Years
		- Security Assurance Reference Materials - Security Project Delivery Model Artefacts - Security Project Delivery populated artefacts and compliance records - Statistical data and reporting including MI packs and dashboards	When updated / superseded Last modified/processed date Last modified / processed date	6 Years Lifetime of the System / Process 6 Years
IT.IOPS	Infrastructure and Operations	Disaster Recovery and Backups	Date of last update for each document	6 Years
		System Backups	From the date of the backup	32 days
		Fileserver Backups	From the date of the backup	12 days
		Notes Server Backups	From the date of the backup	90 days
		Email raw data searches used to fulfil a Data Subject Access Request	From date DSAR fulfilled	6 months
		System specific retention policies: - Content held in personal and shared mailboxes - Content held in personal and shared mailboxes (Executive Leadership Team and Company Secretary)	Last modified date Last modified date	6 Years 10 Years

<u>Reference</u>	<u>Activity/Information</u>	<u>Description</u>	<u>Start of Retention</u>	<u>Retention Period</u>
IT.ARCH	Architecture	- Architectural Design Papers - Architectural Level Papers	When updated or superseded	Permanent
IT.TGOP	Technology Operations	- Compliance Tracker Documents - Performance Initiative Documents - Executive Reports - Service Review Packs - Planning Materials - Policy and Process Documentation - Process Trackers	When updated or superseded	Permanent
		- Demand and Capacity Reporting - Technology Group Spot Awards	When updated or superseded	Permanent
			End of Year	6 Years
IT.SODL	Software Delivery	- Software Delivery Documentation - Project Documentation - Test Scripts and Results - Audit Histories - Defect Records	Last modified date of a document or on retiral of system.	6 Years or Lifetime of a system