الجـــامعــــة الخـــليجـــية
GULF UNIVERSITY

Title: Document Retention and Control Policy

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Review: The document is subject to a periodic review as per amendments of university policies.

Gulf University adheres to all laws, regulations, resolutions, and instructions issued by the Higher Education Council and to all applicable national regulatory frameworks in the Kingdom of Bahrain.

1. Purpose

This document addresses the identification of documents and records at Gulf University. It also describes the principles to be followed by academic and non-academic departments /units, staff, and management at the University to manage the retention, control, and disposal of documents and records. This policy defines how Gulf University identifies, stores, retains, archives, anonymizes, and disposes of documents and records, including personal data, in compliance with Bahrain Personal Data Protection Law (PDPL) and applicable regulatory, academic, and operational requirements.

2. Scope

This document applies to:

- All academic and administrative units
- All documents and records, whether paper-based or electronic
- All personal data relating to applicants, students, alumni, staff, vendors, and other individuals

3. Acronyms

BQA	Education and Training Quality Authority
GU	Gulf University
PDPL	Personal Data Protection Law

4. Definitions

Record: A record is information in a specific form (complete/final version) that are developed or received due to individual or institutional activities and retained as evidence of that activity for future reference.

Basically, records are the evidence of the University's structure, policies, procedures, guidelines, and activities. Records include information, but not limited to, paper documents, email, any type of electronic file or data, still photographs, motion pictures, drawings, plans/blueprints, and audio/video recordings, etc.

Document: A document is an item that is not a record, such as drafts, duplicates of record copies, information subject to revisions, and materials not directly relating to business activities. In this sense, documents can be disposed of without authorization as soon as they are no longer used. However, these must be retained for an identified retention as far as the documents are in active use in the university.

Documents and Records Retention Schedule: This schedule addresses the management and preservation of university documents and records. It sets the duration for retention of different document/record types, responsibilities for the management of active records, the storage of inactive records, and the archival of permanent records, and the disposal procedure.

Permanent Retention: Permanent retention is the permanent storage of the written documents and records. These shall be stored in a media form and location that will adequately endure the passage of time.

Personal Data: Any data relating to an identified or identifiable individual.

Sensitive Personal Data: Personal data revealing health, biometric, genetic, religious, or other data as defined by PDPL.

Record: Final and complete information created or received as evidence of university activities.

Document: Drafts or non-final materials not required for long-term evidence.

Anonymization: Irreversible processing of personal data so that an individual cannot be identified.

5. Policy Statement

Gulf University commits to:

1. Retaining documents and records only for justified operational, regulatory, or academic purposes
2. Protecting personal data throughout its lifecycle
3. Respecting data subject rights under PDPL
4. Ensuring secure deletion or anonymization after retention periods expire

Following the PDPL principles, Gulf University ensures that personal data is:

1. Processed lawfully, fairly, and transparently
2. Collected for specific and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up to date
5. Retained only for as long as necessary
6. Protected through appropriate security measures

Following the Retention Principles, Gulf University ensures that:

1. Personal data shall not be retained indefinitely unless legally required.
2. Retention periods must be justified by purpose and regulation.
3. Upon expiry of retention periods, data shall be securely deleted or anonymized.

4. Retention schedules must distinguish between applicants, enrolled students, and alumni.

6. Policy Details:

6.1 GU ensures appropriate measures to safeguard the security of university documents and records in accordance with the University's obligations and responsibilities.

6.2 GU commits to consider its documents and records as the property of the university and not of any of the staff members who create them or to whom they are delivered.

6.3 GU ensures an appropriate mechanism of keeping and maintaining the documents and records according to legal, administrative, and historical needs.

6.4 GU ensures appropriate "Documents and Records Retention Schedule" for its active, inactive, and archive documents and records. For some documents or records with status of transitory only, no retention is required.

6.5 GU considers all library and PR material made or acquired and preserved solely for reference or exhibition purposes, and stocks of publications and unprocessed forms are not university records.

6.6 GU ensures that documents and records are properly and timely destroyed after the retention period, in accordance with the "Documents and Records Retention Schedule", and that the privacy interests of the institution and employees are protected.

6.7 Storage and Security: GU ensures that all personal data shall be stored in university-approved systems. Access shall be role-based and limited to authorized staff. Data shall be encrypted where applicable. Regular backups shall be maintained by IT department.

6.8 Backup and Archival: GU ensures that backups are performed in accordance with IT disaster recovery procedures. Archived data is stored securely and access restricted. Archived personal data remains subject to PDPL safeguards.

6.9 Data Subject Rights (PDPL): Gulf University recognizes and facilitates the following rights:

- Right of access
- Right to correction
- Right to deletion (subject to legal obligations)
- Right to object to processing

Requests shall be handled in accordance with approved procedures and timelines.

6.10 Deletion and Anonymization: Secure deletion shall ensure data cannot be reconstructed. Anonymization shall be applied where historical or statistical use is required. Disposal actions shall be documented and auditable.

Below table presents the Documents and Records Retention Schedule to provide overview of the type of document/record, in which form the documents are retained, how long, where and whose custody.

Table 1: Documents and Records Retention Schedule

Document /Record Type	Document/Record List	Retention		College/Unit/Department		Disposition Method
		Hard	Digital	Issued by/owner	Keep at	
University Establishment & Legal Status	Establishment decision from the Council of Ministers	Forever	Forever	Prime Minister Office	President Office	No Disposal
	Commercial Register	2	Forever	Ministry of Commerce & Industry	President Office	Shred
	HEC License & Approvals	Forever	Forever	HEC	President Office	No Disposal
	External Communications	Forever	Forever	HEC	President Office	No Disposal
	Cort & Legalization	Forever	Forever	Any	President Office	No Disposal
University Asset & Contracts	Campus & Other Rentals	10	10	Any	President Office	No Disposal
	Agreements & Contracts	10	10	Any	Relevant Offices	Shred/Deleted
	MOUs	10	10	Any	Relevant Offices	Shred/Deleted
	Agreements with National or Governmental Institutions or Bodies	10	10	Any	Relevant Offices	Shred/Deleted
	Agreements with Community Engagement	5	5	Any	Relevant Offices	Shred/Deleted
	Contracts with Suppliers	10	10	Any	Relevant Offices	Shred/Deleted
	Purchase Requests	5	5	Any	Relevant Offices	Shred/Deleted
	Assets & Resources	5	5	Any	Relevant Offices	Shred/Deleted
University Documents	Bylaws	Forever	Forever	University Council	President Office	No Disposal
	Strategic plan and 5 Year RoadMap	7	7	Any	Relevant Offices	Shred/Deleted
	Policies & Procedures	7	7	Any	Relevant Offices	Shred/Deleted
	Operational Plan	5	7	Any	Relevant Offices	Shred/Deleted
	Annual Reports	5	7	Any	Relevant Offices	Shred/Deleted
	Institutional Review SER & SMs	5	7	Any	Relevant Offices	Shred/Deleted
	University risk assessment & management	5	7	Any	Relevant Offices	Shred/Deleted
	MoM	5	7	Any	Relevant Offices	Shred/Deleted
Accreditation & Academic Programs	BQA/NQF Documents & Reports	5	7	Any	Relevant Offices	Shred/Deleted
	International Accreditation	5	7	Any	Relevant Offices	Shred/Deleted

	Internal/External Quality Reports	5	7	Any	Relevant Offices	Shred/Deleted
	Program Report	5	7	Any	Relevant Offices	Shred/Deleted
	Course File/ Portfolio	5	7	Any	Relevant Offices	Shred/Deleted
	Ranking Documents	5	7	Any	Relevant Offices	Shred/Deleted
	GU Projects (NQF, Accreditation etc.) SER & SMs	5	7	Any	Relevant Offices	Shred/Deleted
	Annual Report	5	7	Any	Relevant Offices	Shred/Deleted
	College/Department/Program Documents	5	7	Any	Relevant Offices	Shred/Deleted
Student Information's	Applicant Data – Rejected / Withdrawn	No Hard	2	A&R	A&R	Secure Deletion / Anonymization
	Applicant Data – Enrolled	No Hard	Duration of Study + 5 Years	A&R	A&R	Secure Deletion
	Student Academic Records	No Hard	Forever	A&R	A&R	Archive
	Student Correspondences	No Hard	5	A&R	A&R	Secure Deletion
	Examination Records	No Hard	5	A&R	A&R	Secure Deletion
	Alumni Information	No Hard	Forever (Anonymized for analytics)	A&R	A&R	Archive / Anonymization
	Student & Alumni Surveys/Reports	No Hard	Forever	A&R	A&R	Shred/Deleted
	Certifications	No Hard	Forever	A&R	A&R	Shred/Deleted
	Student Financial Documents	No Hard	Forever	Finance	Finance	Shred/Deleted
Staff Information's	Applicants Details	2	Forever	HRD	HRD	Shred/Deleted
	Employee File	Employment Duration + 5 Years	Forever	HRD	HRD	Shred/Deleted
	Staff Professional Development	5	Forever	HRD	HRD	Shred/Deleted
	Staff Satisfaction, Appraisals & Exit Survey	5	Forever	HRD	HRD	Shred/Deleted
	Certifications/QUADBAY Reports	5	Forever	HRD	HRD	Shred/Deleted
	Staff Financial Documents	5	Forever	HRD	HRD	Shred/Deleted
Financial	Budget Planning	5	Forever	Finance	Finance	Shred
	Financial Report Account Payable/ Receivable	5	Forever	Finance	Finance	Shred
	Receivables Records	5	Forever	Finance	Finance	Shred
	Sponsor Details	5	Forever	Finance	Finance	Shred
	Invoices	5	Forever	Finance	Finance	Shred
	Quotations	5	Forever	Finance	Finance	Shred
	Accounts Payables	5	Forever	Finance	Finance	Shred
Research	Approval Research Plan	5	Forever	Research Unit	Research Unit	Shred

	Approval Research Projects	5	Forever	Research Unit	Research Unit	Shred
	Budget	5	Forever	Research Unit	Research Unit	Shred
	Conferences	5	Forever	Research Unit	Research Unit	Shred
Community Engagement	Plan	5	Forever	Community Engagement	Community Engagement	Shred
	Events Insights	5	Forever	Community Engagement	Community Engagement	Shred
	Evaluation	5	Forever	Community Engagement	Community Engagement	Shred
Activities & Events	Events Insights	5	Forever	SSU	SSU	Shred
	Career Development Reports	5	Forever	SSU	SSU	Shred
	Sport Activities Records	5	Forever	SSU	SSU	Shred

7. Responsibilities

Academic and non-Academic Units/Departments are responsible for:

- Implementing this document appropriately.

Academic and non-Academic Staff are responsible for:

- Following this document appropriately.

IT department staff are responsible for:

- Security and backups of the data

Admission & Registration staff are responsible for:

- Applicant and student data compliance

HR **staff are responsible for:**

- Staff data compliance

COO is responsible for:

- Monitoring implementation of this document appropriately.

The Vice President for Academic Affairs is responsible for:

- Monitoring implementation of this document appropriately.

University Policy Development and Review Committee is responsible for:

- Systematic review of the effectiveness of this document.

8. Related Policies

- All academic and Administrative Policies

9. Related Procedures

- Document Retention and Control Procedures

10. Related References

BQA	Institutional Review Handbook
BQA	National Qualifications Framework Handbook
BQA	Programs-within-College Reviews Handbook