

College Group Policy

Records Retention

Manager Responsible: Assistant Principal Information & Digital Transformation

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Students:	<input type="checkbox"/>	External:	<input type="checkbox"/>

AMENDMENT SUMMARY

<u>Version</u>	<u>Date</u>	<u>Remarks</u>
1.0	28 Apr 2014	Replaces Administrative Records Management Policy dated October 2008.
2.0	13 Sep 2017	Periodic Review and changes to management nomenclature
2.1	08 Feb 2019	Periodic Review
2.2	04 Oct 2020	Periodic Review. Update to GDPR references following BREXIT.
3.0	28 Apr 2022	Change of document title. Addition of Indicative Retention Period Annex
3.1	04 Sep 2023	Periodic Review. Change of appointment titles
3.2	07 Oct 2024	Periodic Review

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Age, Disability, Gender & Race Equality Statement

Age, Disability, Gender and Race Equality Impact Measures will be set and monitored through analysis of all data related to potential suspected or actual abuse of this policy.

A copy of the Equality Impact Assessment Initial Screening Form is attached as an Annex to this document

1. Introduction

Information is one of the College Group's corporate assets; in the course of carrying out its various functions, the group accumulates information from both individuals and external organisations. It also generates a wide range of data, which is recorded in documents and records.

These documents and records are in several different formats, examples of which include, (but are not limited to) communications such as letters, emails and attendance records; financial information including invoices, statements and reports; legal documents such as contracts; information relating to various types of applications, including forms; and digital photographs and moving image recordings. As web-enhanced learning gains traction, records will also be created in Microsoft 365 applications such as Teams, OneDrive and Stream.

For the purposes of this Policy, the terms 'document' and 'records' include information in both hard copy and electronic form.

In certain circumstances it will be necessary to retain specific records in order to fulfil statutory or regulatory requirements and also to meet operational needs. Record retention may also be useful to evidence events or agreements in the case of disputes, and also to preserve information which has historical value.

Premature destruction of documents could result in inability to defend litigious claims, operational difficulties and failure to comply with the Freedom of Information Act 2000, the Data Protection Act 2018 and other European or domestic Data Protection Regulations.

Equally, the retention of all documents and records is impractical and appropriate disposal is not only encouraged but also a central principle of the Data Protection Regulations. Disposal will assist the College to maintain sufficient electronic and office storage space and will de-clutter office and teaching accommodation, resulting in a more desirable working environment. Lengthy or indefinite retention of personal information could result in the Group breaching the Data Protection Act 2018.

It is important for the above reasons that the Chelmsford College Group has in place systems for the timely and secure disposal of documents and records that are no longer required for business purposes.

2. Policy

Chelmsford College Group is responsible for ensuring that all documents and records created, received and maintained in the process of carrying out our corporate functions are stored, retained and secured in a manner which meets legal and audit requirements.

This Policy is supplemented with the Records Retention Schedule which undergoes routine review to ensure it continues to meet legal and practical requirements. Routinely the College will adopt the schedule recommended by the AoC and/or JISC.

The College Group will ensure that documents will be retained in line with Records Retention Schedule. This Schedule will be reviewed annually to ensure

on-going accuracy and compliance with both legislation and the College Group's needs. It will ensure that any decision relating to the retention of records that contain personal information will be made in accordance with the Data Protection Act 2018 and other European (while applicable) or domestic Data Protection Regulations.

For ease, a table showing indicative retention periods for generic groups of records is at Annex A.

The Group will have documented procedures for the checking of retention periods. This will extend to those records which are routinely stored 'off-site' with our contracted archive company.

3. Responsibilities

As the Data Controller, and Data Protection Officer, the Assistant Principal Information and Digital Transformation has overall responsibility to ensure that information and documents are only retained as permitted by law. He is also responsible for ensuring the applicability and accuracy of the Records Retention Schedule.

The Senior Leadership Team, alongside the Heads of Department and Business Support Managers are the primary focus for the routine review of documents and information held by the College Group. They are responsible for making decisions as to what material needs to be retained and what should be destroyed. Wherever feasible, hard copy documents which need to be retained should be archived and sent for off-site storage.

The IT & Media Support Manager is responsible for ensuring adequate provision is made for the retention of historical electronic records in a form which facilitates retrieval in a suitable time frame.

The Digital & Data Compliance Manager manages the movement of records to off-site storage and maintains a record of when they should be reviewed for a decision on destruction.

4. Disposal

Care must be taken to ensure that all documents and records which are no longer required are destroyed in an appropriate manner. This is particularly pertinent where the documents may contain personal or sensitive personal data as defined by the relevant Act.

Confidential waste documents should be placed in the confidential waste containers which are located in a number of locations throughout both the Moulsham Street and Princes Road campuses, in order that they can be destroyed. It is essential that any documents which are to be thrown away, and contain confidential, personal or sensitive personal data must be disposed of in this way, in order to avoid breaches of confidence, the Data Protection Act 2018 and other European (while applicable) or domestic Data Protection Regulations.

Disposal of documents other than those containing confidential or personal data may take place by binning, recycling, deletion (in the case of electronic documents), and/or the transfer of documents to external bodies. Transfer of

documents to external bodies will be unusual but could be relevant where documents are of historical interest.

Records of disposal are not routinely required but a record of any material which has been held in off-site storage will be maintained by the Information Services Project Officer.

Indicative Retention Periods

This Annex provides generic guidance on the retention of common records generated by Chelmsford College in the course of normal day-to-day business.

The following table should be viewed as a guide in determining the retention periods for particular document types. The retention periods noted below are largely derived from JISC best-practice documents although in some cases the suggested retention periods have been adjusted to meet the College's requirements.

For definitive information on record retention periods staff should use the published Records Retention Schedule. Heads of curriculum or business areas should use this table to inform their local decision-making regarding retention and refer to Data protection staff if they require additional advice. Retention periods may vary from the template where there are particular legislative and/or statutory requirements.

Record Type	Activity Type	Retention Period
Records documenting the institution's governance arrangements.	Records documenting information that defines the governance arrangements of the organisation, as well as those documenting the business of statutory committees (agenda, minutes / supporting papers)	Permanent
Records documenting the institution's relationships and responsibilities to statutory bodies and in meeting its legal responsibilities.	Records documenting information that: <ul style="list-style-type: none"> The institution is legally obliged to provide to the funding and statutory bodies Underpin the institution's arrangements in meeting legislative requirements (e.g. health and safety strategies / equality and diversity policies) 	Permanent
Records documenting the institution's strategic and corporate plans and those defining relationships with trade unions.	All corporate / strategic level documents (both at institutional and functional level) for example: <ul style="list-style-type: none"> Strategic Plan Teaching and Learning Strategy Risk and/or Performance Management Plans Agreements with Trade Unions Details of Funding Allocations 	Superseded + 10 years then review for long-term archival value

Record Type	Activity Type	Retention Period
Records documenting the institution's regulations and policies	Records documenting the establishment of all key policies and regulations, including those related to staff and student behaviour. For example: <ul style="list-style-type: none"> • Academic Regulations • Tuition Fees Policies • HR Policies • Learner behaviour and Discipline Policies 	Superseded + 10 years then review for long-term archival value
Records documenting the handling of enquiries made by those external to the institution (statutory).	Records documenting enquiries and requests from individuals and/or organisations. For example: <ul style="list-style-type: none"> • Freedom of Information requests • Subject access requests • Correspondence with Information Commissioner's Office 	Last action + 3 years, then destroy
Records documenting relationships with collaborative partners.	Records relating to cooperative partnerships and collaborative arrangements with other institutions.	End of partnership + 6 years, then review for archival value.
Records documenting the organisation's financial management arrangements.	Records detailing College's accounts, payroll handling, procurement, tax arrangements, investments, insurance management etc.	End of current financial year + 6 years, then review for archival value
Records documenting assessment and non-assessment related advice given to students and decisions made about a student, including documents that support the decision making.	Records documenting the conduct and results of: <ul style="list-style-type: none"> • Course and Module Award Boards • Disciplinary hearings • Academic appeals and/or student complaints • Fitness to study • Cause for Concern and Intervention Plans • Assessment feedback documents (not the assessment itself) • Admissions documentation 	Last action on case, or formal confirmation of outcome by appropriate body or, completion of award+ 6 years, then destroy
Records documenting the review, analysis, monitoring and performance of operations.	Records documenting the establishment and use of activities used to monitor the impact or measure the performance of particular activity. For example: <ul style="list-style-type: none"> • Learner Satisfaction Surveys • Enrolment and Retention • Academic success • Self-Assessment Report • College Improvement Plan 	Current Year + 5 years then review for anonymisation and further retention.

Record Type	Activity Type	Retention Period
Records documenting the handling of non-statutory communications with those external to the organisation.	Records documenting general communications with those external to the organisation and the internal handling of related responses. For example: <ul style="list-style-type: none"> • Press release • Marketing campaigns 	Last Action + 2 years, then review for archival value.
Records documenting the planning and completion of specifically defined activities, and the completion of day-to-day administrative tasks.	Non-strategic / non-sensitive administrative information (not required to be retained for external reporting purposes) documenting the design, organisation, operation and summary results of a specific set of activities for a defined end point: <ul style="list-style-type: none"> • Induction Programmes • Open Days • Examinations • Award Ceremonies 	Completion of activity +1 year, then destroy
Records documenting the handling of enquiries made by individuals and/or organisations external to the institution (non-statutory).	Records documenting enquiries, public complaints and requests from individuals/organisations. For example: <ul style="list-style-type: none"> • Reference requests • Complaint by residents 	Last action + 1 year, then destroy
Core staff data held in the central MIS	Personal identifiers and employment details as defined in Appendix 1	Permanent
Associated information forming part of the staff record	Other information, collected during the course of employment, not otherwise identified below.	End of Employment + 6 years or age 72; then destroy
Staff Remuneration	Records documenting staff remuneration. For example: <ul style="list-style-type: none"> • Levels of salary or hourly rates of pay • Pension contributions • Periods of statutory pay; eg. Maternity, Sickness Absence 	End of Employment + 6 years or age 72; then destroy
Sickness Absence	Records detailing absence from work due to sickness, ill health or disability	End of employment + 3 years then destroy
Individual Employment Applications	Unsuccessful applications, and linked non-anonymised protected characteristics and information submitted as part of statutory checks <i>[Successful applications retained as part of the Staff Record.]</i>	Filling of vacancy + 6 months then destroy

Record Type	Activity Type	Retention Period
Records relating to recruitment process	All documentation relating to the recruitment to a particular post. For example: <ul style="list-style-type: none"> • Short-listing notes • Interview records • Output from set tasks • Recordings or reports on practical teaching activities 	Filling of vacancy + 6 months then destroy
Mandatory Training Records	Records of when mandatory training was received by staff. Subjects include: <ul style="list-style-type: none"> • Safeguarding & The Prevent Strategy • Health & Safety, including Manual Handling • Data protection, including GDPR & PECR 	End of Employment + 5 years then destroy
Core student data held in central student MIS.	Personal identifiers and final award details (including confirmed qualification result data) as defined in Appendix 1	Permanent
Associated information forming part of the Student Record	Other information recorded about learners. For example: <ul style="list-style-type: none"> • Information gathered during application • Additional information gathered at enrolment • Contact for support group 	Study end date + 6 years
Assessments (taught students).	Work submitted by students for internal assessments <i>Best practice is for work to be returned to learners once the retention period has been reached</i>	Mark confirmed by Awarding Body + 3 months, then return to learner or destroy
Verification of Assessment Marking	Internal Verification records for work submitted for assessments	Date of certification + 3 years

Personal Data - Core Records

Core Staff Record

Staff Reference

Title

Forename(s)

Used Name

Surname

Previous Surnames

Date of Birth

Appointment History

Appointment

Start Date

End Date

Fraction

Job Descriptions

Employment Contracts

Successful Employment Applications

Core Learner Record

Student Reference

Student ULN

Forename(s)

Surname

Date of Birth

Enrolment History

Course Reference

Course Name

Start Date

End Date

Grade

Achieved Qualifications

Qualification Aim or Course Reference

Dates

Grade

Equality Impact Assessment (EIA) Initial Screening Form

Name of the Policy, Procedure, Practice or Proposal being screened:

Document Retention Policy

Provide a brief description of its purpose:

This Policy set out the mechanisms used by Chelmsford College to ensure that all documents and records created, received and maintained in the process of carrying our corporate functions are stored, retained and secured in a manner which meets legal and audit requirements.

Are there controls in place to monitor the uniform application of this practice? (if no please explain below)

Yes

No

Does the policy or process have the potential to affect a particular group disproportionately in either a positive or negative way? Please provide comments with supporting evidence:

The policy is to be universally applied to all documents owned or handled by the Chelmsford College Group. In this way any information, whether it applies to staff, learners, or those who no longer have a direct association with the College Group will be protected and safeguarded in the same way. Thus, there is no potential for a particular group to be affected either positively or negatively.

If you have identified a medium or high equality impact please complete the following, otherwise leave blank. Add additional comment below the questions as necessary.

Are there any other policies or practices that need to be assessed alongside this screening?

Yes

No

Should the policy or practice proceed to a full Equality Impact Assessment?

Yes

No

If the answer to the above question is no, please give the reasons for this decision:

If a full impact assessment is required, please give the date by which it will be completed

(Note – If you have assessed a negative impact as high, you must seek advice and conduct a full EIA on a high priority basis)

Declaration:

We are satisfied that an initial screening has been carried out and a full Equality Impact Assessment [~~is~~ / is not] required at this time.

(If a full EIA is required, a template form is available within the EIA Guidance Notes which must be read before completing a full EIA).

Manager:

Signature:

M Emerson

Date:

02 Sep 2023

Countersigned

Signature:

D Warnes

Date:

02 Sep 2023