Barking & Dagenham College

# Document Retention Policy

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| Policy Author: | Chief Governance Officer/ Data Protection Officer | Date of Approval: | September 2024 |
| Approved By: | SLT Policy Committee | Reviewed: | Every Two Years |

## OUR VISION

**To be an exceptional college**

## OUR MISSION

**Empowering futures, transforming lives**

## OUR CULTURE AND VALUES

**Barking & Dagenham College is a unique, diverse and inclusive environment in which everyone is supported to grow, develop and really flourish.**

We treat each student as an individual because we know that everyone is different. Every individual has their own unique talents, circumstances, challenges and aspirations. Every student brings something special and it is this diversity and richness of ideas that makes College life interesting, fun and vibrant. Our culture is such that all students, staff and visitors should feel welcome, safe and valued. Guided by our principles of honesty, integrity and transparency, we treat each other respectfully and seek to establish trust. By building resilience and confidence, we encourage students and staff to rise above challenges with determination and a positive mindset.

Whilst we are rightly proud of our unique internal culture, Barking & Dagenham College is an outward facing organisation that recognises the critical importance of working through networks and collaboration to lead change and influence local agendas. By partnering with industry-leading employers and embracing innovation, digital technologies and new ways of thinking, we strive to push the boundaries of learning and ensure that our students are ahead of the curve. Our many stakeholder partnerships mean that we have established our place at the heart of our community and as a key partner in the regeneration of the London Borough of Barking and Dagenham.

At Barking & Dagenham College, we are dedicated to inspiring students and staff to embrace challenges and pursue their dreams with confidence. Most of all, we are ambitious and we expect excellence - from ourselves and from our students.

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## 1 Policy

**1.1** Barking & Dagenham College (the "College") must, in respect of its processing of personal data, comply with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and related legislation (together, "Data Protection Laws").

**1.2** This Retention Policy should be read in conjunction with the College's Data Protection Policy, which sets out the College's overall approach to data protection matters and sets out the rationale for why a Retention Policy is required for personal data.

**1.3** The College is under a legal obligation only to keep personal data for as long as the College needs it. Once the College no longer needs personal data, the College must securely delete it. The College recognises that the correct and lawful treatment of data will maintain confidence in the College and will provide for a successful working environment.

**1.4** This Policy applies to all College employees, consultants, contractors and temporary personnel hired to work on behalf of the College ("College Personnel").

**1.5** All persons with access to personal data must comply with this Retention Policy.

**1.6** Please read this Retention Policy carefully. All College staff must comply with it at all times. If you have any queries regarding this Retention Policy, please consult with the Data Protection Officer. You are advised that any breach of this Retention Policy will be treated seriously and may result in disciplinary action being taken against you.

**1.7** College staff will receive a copy of this Policy when they start and may receive periodic revisions of this Policy. This Policy does not form part of any College Personnel's contract of employment and the College reserves the right to change this Policy at any time. All staff are obliged to comply with this Policy at all times.

## 2 About this policy

This Retention Policy explains how the College complies with our legal obligation not to keep personal data for longer than we need it and sets out when different types of personal data will be deleted.

- The College will retain a document based on the following principles:
- The document or record still has a use or business purpose
- There is an applicable Statutory Minimum Retention Period
- The document or record is relevant to an outstanding funding claim or current litigation, arbitration or investigation. Or, the record had evidential value for a possible claim.
- The document is subject to audit.

## 3 Data Retention Periods

**3.1** The College has assessed the types of personal data that the College holds and the purposes the College use it for. The table below sets out the retention periods that the College has set for the different departments within the College, and the different types of data that they each hold.

**3.2** If any member of College Personnel considers that a particular piece of personal data needs to be kept for more or less time than the period set out in this policy, please contact the Data Protection Officer for guidance.

## 4 Archive Storage and Retrieval

**4.1** Documents where possible will be stored in a way that environmentally sustainable, preserves their integrity and readability and restricts access to appropriate individuals only.

**4.2** Upon a request from an external agency the college may make available for access to the requested records. Any transfer of ownership of the data or of the documents shall be documented. The new owner shall assume responsibility for archiving.

**4.3** Access to archives shall be restricted to the named individuals responsible for the archives. The media used to store essential documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available upon request. Any alteration of records should be traceable.

**4.4** All essential documents should be boxed and labelled with the contract reference number, any course reference, the date they were archived, and date to be destroyed (if available).

**4.5** The department administrator (or equivalent) should maintain a record of details of archived essential documents. Records should include details of the contract reference, archiving location and person authorised to access these documents, the date they were archived, and date to be destroyed (if available).

**4.6** The documents should be archived in an appropriate room or locked cupboard (consider fire protection without water sprinkler systems, water protection, for humid conditions, pests etc.). The room or cupboard must be secure with access only by authorised personnel.

**4.7** If appropriate, an external archive site may be utilised as arranged by the college's Head of Estates.

## 5 Retention Periods for different categories of data

| Type of Data | Format | When will the College delete it (if manual)? | When will the College delete it (if electronic)? | How will the College delete it (if manual)? | How will the College delete it (if electronic)? | Comments |
|---|---|---|---|---|---|---|
| **Exam results** | Electronic | 6 years | 10 years | | | Results are logged and recorded on the student record corporate system |
| **Student Consent** | Paper Copies | After course has | | | | |
| **Forms** | | completed | | | | |
| **Coursework/ portfolios** | Paper copies | As required, up to 3 years after completion | N/A | | | Held in storage |
| **BTEC Coursework** | Paper and Electronic | 12 weeks after certification claimed | 12 weeks after certification claimed | | | |
| **Complaints & Compliments** | Electronic | | 3 years | | | |
| **Enrolment and Learner Record documents (except ESF)** | Paper as well as electronic | 6 years | 10 years | | | Paper copies held in storage. Any held in curriculum are added to portfolios and deleted by the same process. |
| **Safeguarding Files** | Electronic | | 7 years | | Deleted from drive and removed from back up file. | |
| **Student attendance/ registers** | Paper as well as electronic | 6 years | 10 years | | | All electronic documentation will be kept for the same length of time as for paper copes |

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| **Student Financial support documentation** | Paper as well as electronic | 5 years | 5 years | | | This includes EMA; Guaranteed bursaries; Bursaries; Childcare support |
| **Curriculum course forms** | Electronic | n/a | 3 years | | | Available online |
| **MIS statistical reports** | Electronic | N/A | 3 years | | | Available online for longer period |
| **Admissions records** | Electronic and paper based | 1 year | 10 years | | | |
| **Additional Learning Support records** | Paper and Electronic | 6 years | 6 years | | | This covers learning support records |
| **Assessment & IV records** | Paper and Electronic | 3 years | 3 years | | | |
| **Financial Records** | Paper and Electronic | 6 years | indefinitely | | | This covers all invoices |
| **2007-13 round of European Social Funding (ESF)** | Paper and Electronic | Retained until 31 December 2022 | Retained until 31 December 2022 | | | The college must retain all documents necessary to verify the services provided by itself or by its approved subcontractors. |
| **2014-20 round of European Social Funding (ESF)** | Paper and Electronic | Retained until 31 December 2030 | Retained until 31 December 2030 | | | The college must retain all documents necessary to verify the services provided by itself or by its approved subcontractors. |
| **Staff Records** | Paper and Electronic | 7 years | 7 years | | Shredded | Paper records kept in archive store |
| **Visitor Information** | Paper | 5 Days | | | | |
| **Supplier Information** | | | | | | |

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|---|---|---|---|---|---|---|
| **Governance: Signed Minutes for Corporation and Committees** | Paper | Indefinitely | | | | |
| **Governance: Corporation and Committee Papers** | Paper | 6 Years | | | | |
| **Governance: Register of Interest Forms** | Paper or Electronic | 6 Years | | | | |
| **Governance: Governor contact information** | Paper or Electronic | 2 years after end of membership | | | | |
| **Governance: Images in printed media** | Paper or Electronic | 12 months after appointment ended | | | | |
| **Capital Projects** | Paper or Electronic | 12 years | | | | |

Please refer to the JISC FE Retention Schedule for retention periods for specific areas: http://bcs.jiscinfonet.ac.uk/fe/download_excel.asp

## 6 Changes to this policy

The College reserves the right to change this policy at any time.