

# **Document Retention Policy**

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## **CONTENTS**

1	POLICY	2
2	ABOUT THIS POLICY	2
3	DATA RETENTION PERIODS	3
4	ARCHIVE STORAGE AND RETRIEVAL	3
5	RETENTION PERIODS FOR DIFFERENT CATEGORIES OF DATA	3
6	CHANGES TO THIS POLICY	5

#### 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 General Data Protection Regulation 2016/679, 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	Paper	After course				
Consent	Copies	has				

Forms		completed.			
Coursework/P ortfolios	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/reg isters	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
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		3 1 2 2
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					
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: <a href="http://bcs.jiscinfonet.ac.uk/fe/download\_excel.asp">http://bcs.jiscinfonet.ac.uk/fe/download\_excel.asp</a>

## 6 CHANGES TO THIS POLICY

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