RECORDS RETENTION POLICY AND PROCEDURE

BACKGROUND

The [Freedom of Information](#) (FOI) Act requires all public sector organisations to have established procedures in place to be able to deal with requests for information from members of the public.

Data Protection legislation (Data Protection Act 1998 and the General Data Protection Regulations from 25th May 2018) also contains requirements that impact on records retention namely, the requirement that personal data should not be retained for excessive periods and that data must be stored and disposed of securely.

The retention periods for many financial/legal documents must be clear in order to comply with mandatory requirements of external organisations such as HM Revenue and Customs and funding providers.

Health and Safety legislation requires the retention of key health and safety reports and documentation and Employment legislation requires the retention of records on current and past employees.

The management, retention and disposal of documents can be a costly operation and it is important that the only records that are retained are those defined in this schedule; in the context of this and the requirement to manage records for legislative purposes, the EKC Group therefore needs to consider and re-affirm its procedures for records retention.

DOCUMENT PURPOSE
This document aims to provide clear directives for the retention, storage and disposal of key documents generated and received by EKC Group. Specifically:

- To ensure that records required to be kept for legal/statutory reasons are retained for the appropriate period and in such a manner that allows them to be retrieved and admissible as evidence.
- To ensure the efficient, controlled and appropriate disposal of records that are no longer needed.

The term 'document' includes records in all media and formats including paper, microfilm, electronic records held on magnetic or digital media and photographic materials.

The records retention schedule is based on the guidance published by JISC for further education colleges.

The following categories of records are not specifically included in the policy because their value depends entirely on their context and content:
- General correspondence

Policy Owner: Head of Student and Community Affairs
Approving Body: Policy Committee
Date of approval: May 2018
Page 1 of 5

- Reports
- Meeting papers (agenda, minutes, etc)

Retention and disposal schedules and procedures should, as a minimum:
- Identify which documents and records should be retained and the minimum retention periods for each record type.
- Identify procedures for selecting records for retention or disposal and the frequency with which that selection process should take place.

RECORDS RETENTION SCHEDULE

EKC Group's retention schedule is based on the [JISC retention schedule](#) for further education providers and the ESFA's financial memoranda. The schedule includes details about the document owner and the legislative context (where applicable) for retention of the document(s).

Any records not included in the JISC retention schedule should be maintained for a minimum of 5 years. If staff are in any doubt as to whether documents should be retained or destroyed, they should refer the matter to the Head of Student and Community Affairs who is also EKC Group's Data Protection Officer.

PROCEDURES

1.   Archiving of paper records

Archive facilities within the Group hold the following paper records:

1.1 Student records
- Folkestone College – all student related records for the Broadstairs, Dover and Folkestone Colleges
- Canterbury College – all student related records for Canterbury and Sheppey Colleges.

Records archived in these two facilities are limited to:
- Student files*
- Work based learning*
- Apprenticeships*
- Welfare and grants
- Partnerships*
- Community education*

N.B. It should be noted that all student records need to be retained until 31st December 2022 for student funding from 2007-2013 and until 2030 for student funding from 2014-2022. This is because ESF funding rules require these retention timelines to be adhered to. Because it is

Policy Owner: Head of Student and Community Affairs
Approving Body: Policy Committee
Date of approval: May 2018
Page 2 of 5

not possible to definitively identify which students have received ESF funding, the assumption needs to be that all students have received ESF funding.

1.2 EKC Group records
Broadstairs and Canterbury – all group records including:
- HR
- Finance
- Governance
- Strategy, performance and audit
- Legal services
- Marketing
- Estates management
- Technology
- Health and Safety
- Environmental

Records which are not sent for central archive will be held within relevant areas for the appropriate retention period. It should be noted that it is not good practice to retain both paper and electronic records. Document owners should therefore determine how records will be retained and this must be recorded on the retention schedule.

2.   Preparing paper records for archive

All paper records must be suitably prepared prior to the data being sent for archiving.

This includes the following activities:
- The removal of duplicate data
- The removal of any data that does not fall under the records retention schedules and which should not therefore be archived. The retention of unnecessary data is costly and could potentially be a breach of data protection legislation e.g. if the records relate to personal data.
- The removal of all plastic wallets, sleeves and box files. This aids the destruction process at the end of the archiving period as all paper records can then be sent for confidential destruction without further intervention.
- The collation and securing of loose data
- Keeping a record within the area of what has been sent for archiving

All records must be placed in archiving wallets, boxed up and sent to the appropriate College for storage. Wallets must be clearly marked with the following information using the wallet labels (Avery A4/A5 7171) on the data protection area of Sharepoint:
- Record type (see 1.1 for details)
- Sub heading giving further information about the records e.g. programme area, alpha order details etc.
- Academic year the records relate to
- College or Group function

Policy Owner: Head of Student and Community Affairs
Approving Body: Policy Committee
Date of approval: May 2018
Page 3 of 5

- Destruction date

Records/documents with different destruction years must not be stored in the same wallet.

All group records under heading 1.2 must be placed in archiving boxes and clearly labelled with two archiving box labels (the template can be found on the Group Services pages of CIS). Boxes must not be overfilled. One label must be taped to the top of each box and the other to one of the short sides for the box. Boxes must then be sent to the appropriate College for storage.

Any data which does not fall under the categories detailed in 1.1 and 1.2 or which has not been prepared and/or labelled correctly, will not be accepted for archiving.

Areas will work on archiving annually during admin week in July. This means that all records to be sent for archiving will be managed in accordance with this procedure. All records to be disposed of will be removed from the archiving facility and disposed of via a confidential waste disposal service as detailed in section 4.

The Assistant Principal/College Business Manager will oversee this operation for all student records and the relevant contact for group records will oversee archiving of group records.

All records will be recorded on the appropriate archiving spreadsheet.

3.   Archiving electronic records

Electronic records, like paper records, can be at risk of loss/damage is they are not managed appropriately. Portable storage devices like CD-ROMS, DVDs and USB drives are not intended for long-term storage or perseveration of digital records. They are short-term storage solutions and should be used with caution.

Regular and frequent changes in Information Technology mean that the currency or lifespan of certain technologies should be considered when sending electronic records for archive.

Wherever possible, electronic records should be saved on the College's network which is backed up regularly. Under no circumstances should personal data be saved on Cloud based platforms or on a computer's hard drive/desktop.

4.   Disposal of records

When records have reached their retention period, data will be disposed of securely and confidentially.

The confidential destruction of records is a crucial element of good records management practice. It is a requirement of data protection legislation that all information relating to identifiable, living individuals is disposed of in an appropriately secure manner.

Policy Owner: Head of Student and Community Affairs
Approving Body: Policy Committee
Date of approval: May 2018
Page 4 of 5

Material that falls under any of the following categories needs to be treated as confidential:

- Records containing personal information (for example UCAS forms, payroll and pensions records, completed questionnaires, staff files, research grant applications etc.)
- Records of a commercially sensitive nature (for example contracts, tenders, purchasing and maintenance records, legal documents)
- Records concerning intellectual property rights (for example unpublished research data, draft papers and manuscripts).
- Material not classified as confidential may be disposed of via college waste disposal services.

On an annual basis (during administration week in July) Heads and Managers, are responsible for ensuring that their respective teams sort through and dispose of redundant electronic records in accordance with the records retention schedule.

Policy Owner: Head of Student and Community Affairs
Approving Body: Policy Committee
Date of approval: May 2018
Page 5 of 5