

Records Retention Policy

1. Introduction

- 1.1. This policy deals with the appropriate procedures for the retention and disposal of information by Chichester College Group, to ensure that we do this consistently, and that we document any actions taken. Unless otherwise specified the retention and disposal policy refers to both physical and electronic records.
- 1.2. From here on in, references to the Chichester College Group will be simplified to the “Group”.
- 1.3. In scope are all people, information, technologies, resources and facilities that deal with electronic and physical records for which the Group is responsible.
- 1.4. There are specific rules that apply to the retention of documents with regards to ESF funded and match funded qualifications; documents must be retained for 10 years after the end of the funding.

2. Review of Records

- 2.1. Review is the examination of records at the end of their retention period to determine whether they should be permanently destroyed or retained for longer.

3. Records Retention

- 3.1. Records should be retained only for as long as they are needed to meet our operational and business needs, and to comply with legal and regulatory requirements. We have assessed our records to determine:

- their value to the Group
- their importance as evidence of activities and decisions
- any regulatory retention requirements, such as current: Data Protection, Freedom of Information, Environmental Information and Limitation

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legislation and regulations.

- to be relevant to or provide evidential value for any claim, litigation, arbitration, or investigation.

3.2. Departments are responsible for managing records in their care, ensuring only relevant records are archived and that all boxes containing archive materials are properly annotated using the archive label template to allow individual records within boxes to be retrieved on request (appendix 1).

3.3. Where practical it is the preference of the Group that records are retained in a machine-readable electronic format.

3.4. Where the Group retains paper records, consideration should be given to an appropriate storage location recognising the sensitivity of records, frequency of access required and retention period.

4. Archiving Facilities

4.1. Records where regular access is required should be kept locally in the department. Held in a secure location which does not constitute a fire risk or a health and safety hazard.

4.2. Where documents do not require regular access but must be retained, these should be placed into archiving.

4.3. It is the preference of the Group for paper records with a data classification level of public or private, intended for long term storage to be kept onsite. Onsite archiving facilities are maintained at:

- Worthing College – The Vault
- Northbrook College, Broadwater site
- Brighton MET College, Central site - Pelham Building

4.4. Paper records with a classification level greater than private or where onsite archiving facilities are at capacity, it is preferable for these records to be digitised or stored with the Group's approved offsite archiving provider. This can be facilitated by the Information Governance team.

4.5. Group archive facilities are managed by the Information Governance team and the

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Group's Archive Administrator.

5. Disposal

5.1. Records fall into two main categories for disposal:

- Destroy after an agreed period – where the useful life of a series or collection of records can be easily predetermined (for example, destroy after 3 years; destroy 2 years after the end of the financial year).
- Review – see 2 above.

5.2. Records shall be destroyed as follows:

- Non-sensitive paper information can be disposed of using recycle bins where appropriate
- Confidential information must be disposed of using a cross cut shredder, pulped, burnt or destroyed via the Group's contractor.

5.3. Destruction of confidential information in electronic form must be carried out in such a way that it cannot be recovered. Advice should be sought from IT Services.

5.4. Destruction of confidential information in paper form must be destroyed in accordance with DIN 66399 with a minimum security level of P4 - maximum cross cut particle surface area 160mm² with a maximum strip width of 6mm = 6x25mm.

5.5. It is not necessary to document the disposal of records which appear on the Disposal Plan. Records disposed of outside of the Plan, for example by being disposed of earlier or kept for longer will need to be recorded for audit purposes.

6. Sharing

6.1. Copies of records should be destroyed when no longer required for the purpose they were copied. Where information has been regularly shared between departments, only the original records should be retained.

6.2. Where the Group shares information with other organisations, we must ensure that they have adequate procedures to ensure that the information is managed in

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accordance with our policies, as well as current legislative and regulatory requirements. This should be detailed within a data sharing agreement.

6.3. Where appropriate a data privacy impact assessment should be conducted.

7. Guidelines for archiving

7.1. The following schedule sets out the periods for which documents should be retained in relation to key business areas and to meet operational needs. In some cases, retention periods will be determined by statutory requirements while others will reflect the requirements of the College.

7.2. The period of retention refers to that period after the current year and applies to both electronic and hard copy documents:

Document		Maintained By	Retention Period	Responsible Department
1	Governance			
1.01	Agenda, papers and Minutes of the Board and its Committees	Clerk to the Governing Body	Life of the College	Executive Office
1.02	Appointments of Members of the Governing Body	Clerk to the Governing Body	Termination of appointment + 6 years	Executive Office
1.03	Register of Interests	Clerk to the Governing Body	Termination of appointment + 6 years	Executive Office
1.04	Terms of Reference	Clerk to the Governing Body	Life of the Committee	Executive Office
1.05	Governor Training	Clerk to the Governing Body	Termination of appointment + 6 years	Executive Office
1.06	Annual Proxy meeting and Polling Cards	Clerk to the Governing Body	No Poll – 3-month Poll – 1 year	Executive Office
1.07	Strategic Plans – key records	Clerk to the Governing Body	Current + 10 years	Executive Office
1.08	Establishment of governance structure and terms of reference	Clerk to the Governing body	Life of the College	Executive Office
1.09	Establishment and Closure of Committees and Companies	Clerk to the Governing Body	Life of the College	Executive Office

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Document		Maintained By	Retention Period	Responsible Department
2	Executive Office			
2.01	Contracts, Agreements and Licenses	Chief Operating Officer	7 years	Executive Office
2.02	Agenda, papers and Minutes of management working groups	Principal	3 years	Executive Office
2.03	Establishment of Legal Framework	Clerk to the Governing Body	Life of College	Executive office
3	Estates and Facilities			
3.01	Inspection of property	Director of Estates	Completion + 6 years	Estates & Facilities
3.02	Maintenance and repair of property	Director of Estates	Completion + 15 years	Estates and Facilities
3.03	Building Plans	Director of Estates	Life of the buildings	Estates & Facilities
3.04	Transport – inc. Driver record book, mileage, MOT test, vehicle maintenance	Director of Estates	3 years after vehicle disposed of	Estates & Facilities
Finance				
4	Finance			
4.04	Financial Records – inc. Invoices, receipts, ledgers, accounts, returns, statements, cheques, reports, claims, arrears, VAT	Chief Finance Officer	Audit + 7 years	Finance Office
4.05	Accounts required by Sect 221 Companies Act	Chief Finance Officer	6 years from date made (public company)	Finance Office
4.06	Capital (invoices)	Chief Finance Officer	Audit + 10 years	Finance Office
4.07	Internal and External Audit Reports	Chief Finance Officer	Audit + 7 years	Finance Office
4.08	Tenders	Chief Finance Officer	7 years	Finance Office
4.09	Insurance inc. Schedules, claims, settlements	Chief Finance Officer	Current + 7 years	Executive Office
5	Quality			
5.01	Quality Assurance Handbook	Deputy Principal Quality	Life of the organisation	Quality Office
5.02	Reports from External Professional & Statutory Bodies	Deputy Principal Quality	Life of the organisation	Quality Office
5.03	External Inspections	Deputy Principal Quality	Life of the organisation	Quality Office
5.04	Staff Professional Development Records	Head of Professional Development	5 years	Prof. Dev. Office
5.05	eSARs and ARAQs	Deputy Principal Quality	Current + 5 years	Quality Office

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Document		Maintained By	Retention Period	Responsible Department
5.06	Surveys	Deputy Principal Quality	Current + 5 years	Quality Office
5.07	Complaints	Deputy Principal Quality	Current + 3 years	Quality office
6	Health and Safety			
6.01	Accident Register/Reports inc. HSE and RIDDOR reports	Health & Safety Manager	7 years	Estates & Facilities
6.02	Inspections/Assessments/Records inc. PAT, equipment, lifts	Health & Safety Manager	7 years	Estates & Facilities
6.03	Fire Certificates	Health & Safety Manager	Until Superseded	Estates & Facilities
6.04	Risk Assessments	Health & Safety Manager	Until Superseded	Estates & Facilities
6.05	Health Records inc. Asbestos, Compressed Air, COSHH	Health & Safety Manager	40 years from date of last entry	Estates & Facilities
6.06	Safety Declarations inc. Construction, EC conformity, machine and other maintenance	Health & Safety Manager	Life of subject	Estates & Facilities
7	Human Resources			
7.01	Payroll Data inc. Pay claims, expense claims, tax, summary records	Chief Finance Officer	Audit + 6 years	Payroll Office
7.02	Recruitment Files	Director of HR	6 months from date of decision	Human Resources
7.03	Personnel Files inc. Contracts, appraisals, development records, health records, disciplinary (unfounded – destroy immediately)	Director of HR	Duration of employment + 6 years	Human Resources
7.04	Pension Scheme/Investment Policies	Chief Finance Officer	12 years after benefit ends	Payroll
7.05	Pension Records inc. Payments, adjustments, reports	Chief Finance Officer	12 years after benefit ends	Payroll
7.06	Redundancy	Director of HR	<20 – 3 years >20 – 12 years	Human Resources
7.07	Trade Union Agreements	Director of HR	Duration of agreement + 10 years	Human Resources
7.08	Whistleblowing	Director of HR	Length of time stated in the Agreement	Human Resources
8	Legal			
8.01	Deeds to Property	Chief Operating officer	Indefinitely or until transferred	Executive Office

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Document		Maintained By	Retention Period	Responsible Department
8.02	Company Registers inc. Papers	Clerk to the Governing Body	Life of the Organisation	Executive Office
8.03	Policy Papers	Chief Operating Officer	Life of the Organisation	Executive Office
8.04	Incorporation or Articles of Association inc. Change of name	Chief Operating Officer	Life of the Organisation	Executive Office
8.05	Register of Seals	Clerk to the Governing Body	Life of the Organisation	Executive Office
8.06	Contracts, Agreements, Leases and Other (inc. Planning permission)	Chief Operating Officer	12 years after expiry	Executive Office
8.07	Patents	Chief Operating Officer	12 years after expiry	Executive Office
8.08	Trade and Service Marks	Chief Operating Officer	10 years after cessation	Executive Office
8.09	Data Protection & Freedom of Information Register	Chief Operating Officer	Current + 7 years	Executive Office
9	Learner Records			
9.01	Course/Subject Details	Section Leader	Life of Course + 5 years	Admin Office
9.02	Course/Subject Materials	Section Leader	1 year	Admin Office
9.03	Student Details (inc. personal data, attendance records, achievements) – limited to 'registered' student	Student Tutors	Current + 6 years	Admin Office
9.04	Learner Services: <ul style="list-style-type: none"> - Counselling - Advice and Guidance - EMA - Student Fund - Childcare Support - Transport 	Additional Support Additional Support Student Experience Student Experience Student Experience Student Experience	Current + 6 years Current + 6 years Current + 6 years Current + 5 years Current + 5 years Current + 6 years	Admin Offices
9.05	Student Applications inc. Unsuccessful applications	Admissions Team Lead	Current + 1 year	Admissions
9.06	Further Education Coursework	Section Leaders	1 year from completion	Curriculum Areas
9.07	Higher Education Student Assessed Work	Section Leaders	5 years from course end	Curriculum Areas
9.08	Accommodation	Accommodation	Current + 7 years	Accommodation
9.09	Safeguarding	Deputy Principal	Until the data subject reaches the age of 25	Exec Office
9.10	Management Behaviour Referrals inc. expulsion	Student Tutors	Current + 6 years	Admin Office
9.11	Work Experience inc. Agreement Forms, Registers, H&S Information	Job Shop	Current + 5 years	Admin Office

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Document		Maintained By	Retention Period	Responsible Department
9.12	Off-Site Visits	Section Leaders	Current + 5 years	Curriculum Areas
9.13	Timetables	Timetabling & Registers Co-ordinator	Current + 5 years	Information & Funding
9.14	Registers	Timetabling & Registers Co-ordinator	Current + 5 years	Information & Funding
9.15	Exams (inc. Entries, results, certificates, timetables, special considerations, appeals)	Exam Co-ordinator	Current + 5 years	Exams
9.16	Higher Education Transcripts	Higher Education	120 years from birth	Higher Education
9.17	References from employers or other educational establishments	Information & Funding	Last action + 1 year	Information & Funding
9.18	Enrolments	Information & Funding	Current + 5 years	Information & Funding
9.19	Achievement Records	Information & Funding	Current + 5 years	Information & Funding
9.20	Benchmarking Exercises & Comparables	Information & Funding	Current + 1 year	Information & Funding
9.21	International Students	Director of International	Current + 5 years	International
9.22	ESF & Match Funded Qualifications	Information & Funding	Until at least 31 December 2030	Information & Funding
9.23	Open University	Higher Education	120 years from birth	Higher Education
10 IT Services				
10.01	Software Licenses	Director of IT	Current + 1 year	IT Services
10.02	Inventories	Director of IT	Current only	IT Services
10.03	e-Mail Accounts	Director of IT	Closed within 7 days of leaving Deleted after 1 year	IT Services
10.04	e-Mail inbox	Director of IT	Effective post-merger of IT systems 2 years from date of email	IT Services
10.05	e-Mail sentbox	Director of IT	Effective post-merger of IT systems 2 years from date of email	IT Services
10.06	e-Mail junk folder	Director of IT	30 days from date email entered mailbox	IT Services

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Document		Maintained By	Retention Period	Responsible Department
10.07	e-Mail deleted items folder	Director of IT	90 days from date email entered mailbox	IT Services
10.08	Retention of Backup Tapes	Director of IT	18 months	IT Services
10.09	Barracuda Cloud Retention	Director of IT	18 months	IT Services
10.10	CCTV recordings	Director of IT	Creation + 1 month	IT Services
10.11	Retention of logs in relation to the operation of IT systems	Director of IT	30 days	IT Services
10.12	WEEE IT Asset Disposal	Director of IT	4 years	IT Services
11	General Administration			
11.01	Meeting Papers	Admin Assistants	Current + 1 year	Admin Office
11.02	Booking Forms	Admin Assistants	Current + 1 year	Admin Office
11.03	Purchase Orders	Admin Assistants	Current + 1 year	Admin Office
11.04	CRM	Director of Sales and Marketing	Current + 7 years	Sales and Marketing
11.05	Conference Records	Admin Assistants	Current + 1 year	Admin Office
12	Nursery / Childcare Services			
12.01	Childcare Files inc. Registers, medical records, accident records.	Senior Childcare Manager	Current + 21 years	Nursery
12.02	Complaints	Nursery Manager	Current + 3 years	Nursery
12.03	Setting Diary and Day Books	Nursery Manager	Current + 21 years	Nursery
13	Marketing			
13.01	Marketing Surveys	Head of Marketing	Current + 5 years	Marketing
13.02	Press Stories + Newsletters	Head of Marketing	Life of the Organisation	Marketing

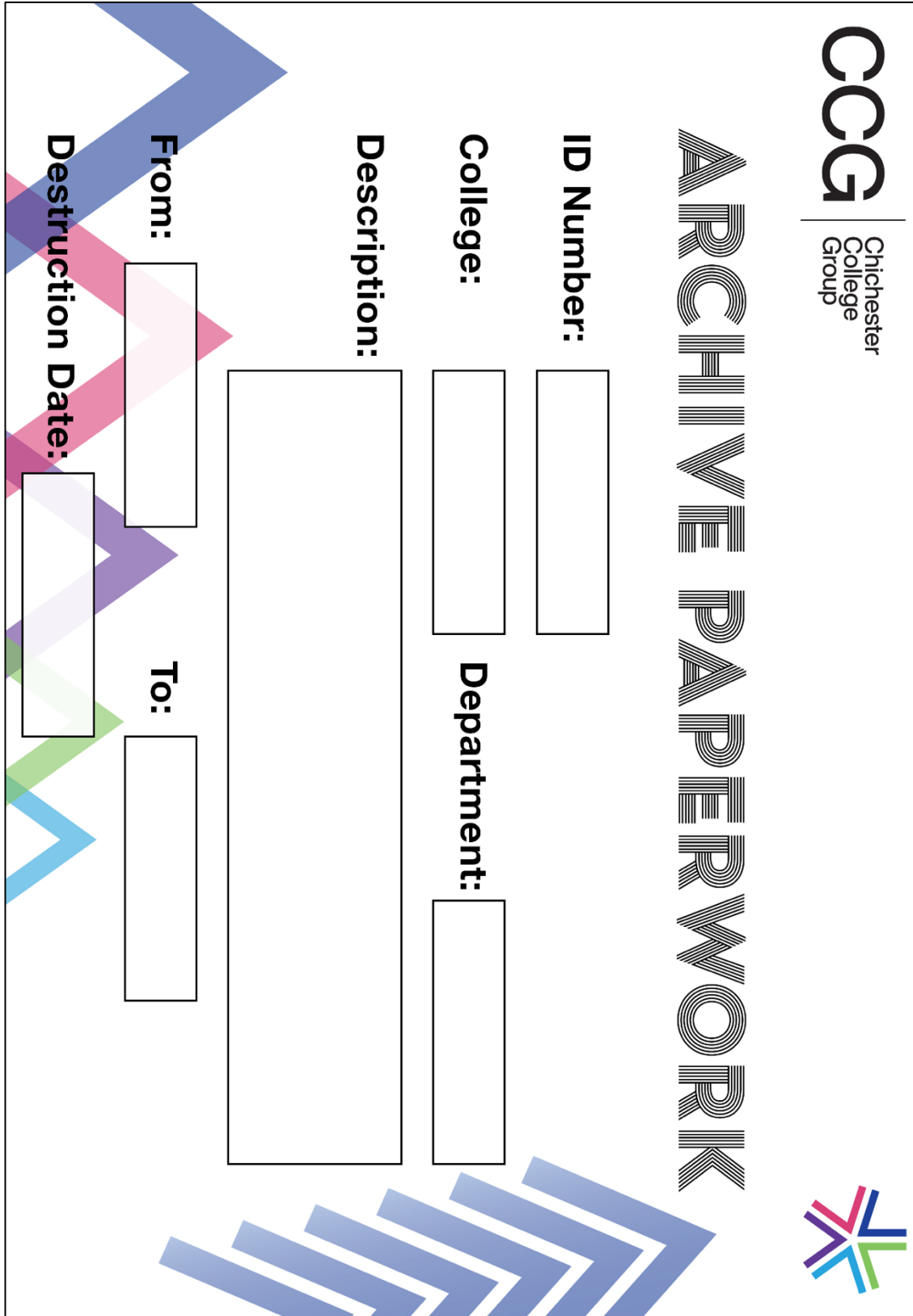
Date approved: 6 July 2023
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 Date for review: October 2025

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Appendix 1 - Archive Label



The form is titled 'ARCHIVE PAPERWORK' in large, stylized, outlined letters. At the top left is the CCG logo with 'Chichester College Group' text. At the bottom right is a colorful starburst logo. The form contains several input fields: 'ID Number:', 'College:', 'Department:', 'Description:', 'From:', 'To:', and 'Destruction Date:'. The 'Description:' field is a large vertical rectangle. The 'From:' and 'To:' fields are positioned on the left side of the form. The background features decorative blue and purple chevron patterns.

CCG Chichester College Group

ARCHIVE PAPERWORK

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