Data Protection

DATA RETENTION AND DISPOSAL POLICY
APPENDIX 2 OF DATA PROTECTION POLICY

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	Date policy created	27th August 2020	
Approved by:	Bill Harrop	**Approved date:**	28th September 2023
Version number:	**1.1**	**Review date:**	28th September 2024

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1   Application

This Policy sets out the measures adopted by The City of Liverpool College (the "College") referred to as "we" or "our") in respect of the retention and disposal of records that contain personal data or other confidential information.

2   Purpose

The purpose of this policy is to detail the procedures for the retention and disposal of information to ensure that we carry this out consistently and that we fully document any actions taken. Unless otherwise specified the retention and disposal policy refers to both hard and soft copy documents.

3   Review

Review is the examination of closed records to determine whether they should be destroyed, retained for a further period or transferred to an archive for permanent preservation.

4   How long should we keep our records

4.1   Records should be kept for as long as they are needed to meet the operational needs of the Authority, together with legal and regulatory requirements. We have assessed our records to:

4.1.1   Determine their value as a source of information about the College, its operations, relationships and environment

4.1.2   Assess their importance as evidence of business activities and decisions

4.1.3   Establish whether there are any legal or regulatory retention requirements (including: Public Records Act (1958), the Freedom of Information Act (2000), the Limitation Act (1980), the Data Protection Act (2018).

4.2   Where records are likely to have a historical value, or are worthy of permanent preservation, we may choose to archive them at the end of any statutory retention period.

5   Disposal schedule

5.1   A disposal schedule is a key document in the management of records and information. It is a list of series or collections of records for which predetermined periods of retention have been agreed between College and the DPO.

5.2   The Disposal Schedule for the College appears as Section 9 of this Policy

5.3   Records on disposal schedules will fall into three main categories:

5.3.1   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).

5.3.2   Automatically select for permanent preservation – where certain groups of records can be readily defined as worthy of permanent preservation and transferred to an archive.

5.3.3   Review – unknown at present but subject to review in a defined period of time see 3 above.

5.4   Records can be destroyed in the following ways:

5.4.1   Non-sensitive information – can be placed in a normal rubbish bin

5.4.2   Confidential information – crosscut shredded and pulped or burnt

5.4.3   Highly Confidential information – crosscut shredded and pulped or burnt

5.4.4   Electronic equipment containing information - destroyed using Killdisc or equivalent technology and for individual folders, they will be permanently deleted from the system.

5.5   Destruction of electronic records should render them non-recoverable even using forensic data recovery techniques.

5.6   The Disposal Schedule will be kept up to date in that new categories of data are added

6   Data sharing and disposal

6.1   Where we share information with other bodies, we will ensure that they have adequate procedures for data retention and disposal to ensure that the information is managed in accordance with the College's policies, relevant legislation and regulatory guidance.

6.2   Where relevant to do so we will carry out a data protection impact assessment and update our privacy notices to reflect data sharing.

7   Record-Keeping

7.1   It is not necessary to document the disposal of records when that has been done in line with the records retention schedule. Documents disposed of outside the schedule either by being disposed of earlier or kept for longer than listed will need to be recorded for audit purposes.

7.2   This will provide an audit trail for any inspections conducted by the Information Commissioner's Office and will aid in addressing Freedom of Information requests, where we no longer hold the material.

8   Monitoring

8.1   Responsibility for monitoring the disposal policy rests with the College's Data Protection Officer, Bill Harrop HR Director. The policy will be reviewed annually or more often if required.

9   Records retention schedule

	Record	Maintained by	Period of Retention	Location of Records
1	Student/learner enrolment records (hard copy and electronic) Except ESF Project and ESF Match	Director of MIS Head of Classroom Learning Head of Work Based Learning	7 years	Central archive ProSuite (Electronic)
2	Attendance/ register and visit records (hard copy and electronic) Except ESF Project and ESF Match	Head of Partnerships and Commercial Vice-Principal Business Development	7 years	Central archive (paper records) Central archive ProSuite (Electronic)
3	All records related to ESF a) ESF Project, or b) ESF Match Records	Head of Partnerships and Commercial Vice-Principal Business Development	The Group will retain all original invoices, student/learner forms, management information returns and all other documents necessary to demonstrate the delivery of services by the Group and its sub-contractors in relation to the current ESF programme, until 31 December 2030.	Central Archive
4	Examination results Completion Certificates	Head of Classroom Learning Business Manager for Examinations	7 Years	Central archive ProSuite (Electronic)

	Record	Maintained by	Period of Retention	Location of Records
5	Examination certificates		1 Year	Reception
6	Examination entries, internal examination scripts, correspondence with examination bodies, Awarding Organisation Visits etc	Head of Classroom Learning Business Manager for Examinations Head of Quality Heads of Schools	3 Years	Relevant Group Centres
7	Financial records (all records including invoices and receipts, as well as copies of ledgers and accounts – hard copy and electronic)	Group Director of Finance	7 Years	Central Archive
8	Human Resource Management records (hard copy and electronic)	Group HR Director	Indefinitely (as all files will be electronic)	Human Resource Management Archive
9	Payroll records	Group Director of Finance Group HR Director	6 Years (if pension related – indefinite)	Human Resource Management Archive
10	Minutes of the Board of the Corporation and its committees	Clerk to the Corporation Board	Indefinitely	Human Resource Management Archive
11	Agendas, papers and other records of the Board of the Corporation	Clerk to the Corporation Board	10 Years	Human Resource Management Archive
12	Internal and external audits	Clerk to the Corporation Board	7 Years	Human Resource Management Archive
13	Tenders and time-expired contracts	Group Director of Finance	6 Years	Central Archive

	Record	Maintained by	Period of Retention	Location of Records
14	Discretionary Learner Support Fund records	Head of Student Services Group Director of MIS	3 Years	Relevant Group centres and Central Archive
15	Additional Learner Support documentation	Head of Pastoral Support	7 Years	Central Archive
16	Application forms and initial interviews	Head of Student Recruitment and Information	1 Year	Relevant Group Centres
17	Student Timetables Tutorial Records Nursery Registration records Individual Learning Plans Authorised Absence Request Forms Absence Reporting records Counselling records Travel Support records Good Attendance/Achievement records Change to Student Records	Head of Student Recruitment and Information Head of Pastoral Support Nursery Manager	Duration of student's continuous enrolment plus 3 years	Relevant Group Centres
18	Recruitment Records (paper and electronic)	Group HR Director	7 Months	Human Resources Management Archive
19	Customer comments and College Surveys	Group Managers	3 Years	Relevant Group Centres
20	Staff Development Records	Group Managers	5 Years	Relevant Group Centres

	Record	Maintained by	Period of Retention	Location of Records
21	Data Protection Requests	Data Protection Officer	7 Years	Relevant Group Centres
22	Software licences and hardware registers	Group Director of IT	5 Years	Relevant Group Centres
23	Staff email and account information	Group Director of IT	30 days from cessation of employment	Active Directory
24	Contracts under seal	Group Director of Finance	12 Years	Central Archive
25	Contracts under hand	Group Director of Finance	7 Years	Central Archive
26	Accident / Insurance Reports	Group HR Director Group Director of Finance	6 Years	Central Archive
27	Health and Safety records	Group HR Director	10 Years	Central Archive
28	Freedom of Information Requests	Data Protection Officer	1 Year	Relevant Group Centres