

DATA RETENTION GUIDELINES 2023-24

Overall responsibility:	Deputy Principal of Finance & Corporate Affairs
Implementation:	Julian Wood
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Endorsed and approved by Policy & Strategy Group

Date: June 23



Pat Brennan-Barrett

Principal

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1. FACILITIES

Facilities

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Health surveillance and medical records plus air monitoring and/or biological monitoring etc. kept by reason of the Control of Substances Hazardous to Health Regulations 2002	5 years or 40 years in respect of specific individuals	Human Resources	Control of Substances Hazardous to Health Regulations 2002
General Health Surveillance	40 years	Human Resources	To carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and For the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee
Accident books, and records and reports of accidents	3 years after the date of the last entry or, if the accident involves a child/young adult – until that person reaches the age of 21	Estates Health & Safety Officer	<ul style="list-style-type: none"> • Control of Substances Hazardous to Health Regulations 2002 (as amended). • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (as amended). • Data Protection Act 2018. • Management of Health and Safety at Work Regulations 1999 (as amended). • Control of Noise at Work Regulations 2005 (as amended).
CCTV recordings	One month (or until hard drive is full). CCTV recordings may be burnt to disc and held pending investigation	Estates	Data Protection Act 1998 and BSIA Code of Practice
Accommodation records/room utilisation surveys/ property strategy documents	7 years	Estates	

2. MAJOR CAPITAL PROJECTS

Type of Record	Retention Period	Responsibility	Reason for Length of Period
Original contracts, specifications, maps, drawings and other formal documentation relating to the scheme	Indefinitely	Estates	Good practice
Capital grant claims and supporting documentation	7 years after the final grant payment	Finance	Time limits on litigation

3. EMPLOYEE RECORDS

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Senior Executives records	Perpetuity	Human Resources	Historical purposes
Name	6 years	Human Resources	To carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment; To comply with statutory guidance and legal obligations; To enable reporting on special category data to demonstrate the College is meeting its obligations in accordance with the Equality Act 2010; To enable the completion of Freedom of Information and reference requests
Date of Birth			
Address			
Contact Telephone Numbers			
Contact Email Address			
NI Number			
Department of Education & Employment Number			
Proof of Qualifications			
Job Title			
Employee Number			
Criminal Record			
Disqualification by Association Check			
Evidence of Right to Work in the UK			
Certificate of Good Conduct			
DBS Check			
Protected Characteristic (Religion; Disability etc)			
Bank Account Details			

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Driving Licence Passport Details Photograph Emergency Contact Details Online Social Media checks Self-Declaration form			
Unsuccessful Recruitment Applicants' Details	1 year	Human Resources	To carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment; To comply with statutory guidance and legal obligations; To enable reporting on special category data to demonstrate the College is meeting its obligations in accordance with the Equality Act 2010; To enable the completion of Freedom of Information requests
Agency Application Details	6 months	Human Resources	To comply with statutory guidance and legal obligations; To enable reporting on special category data to demonstrate the College is meeting its obligations in accordance with the Equality Act 2010; To enable the completion of Freedom of Information requests

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Safeguarding Concerns	Retirement age or 10 years (whichever is longer)	Human Resources	To carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment
Staff Discipline:			
Written warning - including notes of disciplinary hearings kept on file (subject to satisfactory conduct and performance)	12 months	Human Resources	
Final warning	12 months		
Documentation relating to grievance hearings (notes, reports etc) NOTE: Grievance Committee members must hand in all paperwork to HR at the end of a meeting/hearing to avoid retention of duplicate documents	2 years	Human Resources	Allows for appropriate appeal mechanism and monitoring future grievances.
Pre-employment health screening questionnaire	During employment plus 3 years	Human Resources	Management of Health and Safety at Work Regulations 1999.
Employment references received	During employment plus 6 years	Human Resources	Management of appointment and probation processes
Occupational Health Records - health surveillance and medical records relating to risk assessments or incidents occurring at work	40 years	Human Resources	Management of Health and Safety at Work Regulations 1999 Noise at Work Regulations 1989
Occupational Health Records where reason for termination of employment is connected with health, including stress related illness	During employment plus 3 years	Human Resources	Limitation period for personal injury claims (there may be circumstances where it is not practical to separate these from other Occupational Health Records)
Statutory Maternity Pay records, calculations and certificates, etc.	6 years from the end of the financial year the maternity occurred in	Human Resources Payroll	Statutory retention 3 years from the end of the financial year the maternity occurred in
Statutory Sick Pay records, calculations and certificates and self-certificates	6 years from the end of the financial year they relate to	Human Resources Payroll	Statutory retention 3 years from the end of the financial year they relate to
Parental Leave records	6 years from birth/adoption of the child or 18 years	Human Resources	Statutory retention 5 years

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
	if the child receives a disability allowance		
Pension details (Name; job role; Address; Date of Birth; NI Number; Pension Number; Payroll Reference Number; Health)	In perpetuity	Human Resources	To carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment; In line with payroll retention periods, to allow for any queries to be resolved up to and after the death of the individual.
Facts relating to redundancies:			
Where less than 20 redundancies	6 years from the date of redundancy	Human Resources	Time limits on litigation
Where 20 or more redundancies	12 years from the date of the redundancies	Human Resources	Limitation Act 1980

NB: Data pertaining to Non-Employed staff and the associated retention details can be found within the relevant Privacy Notice.

4. PAYROLL RECORDS

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Income Tax and NI Returns, including correspondence with tax office	6 years after end of the financial year to which the records relate	Payroll, Finance	Income Tax (Employment) Regulations 1993
Wages and salary records	6 years	Payroll	Taxes Management Act 1970

5. FINANCE RECORDS

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Financial records (including purchase and sales invoices, bank statements, receipts, payment requests and supporting documents, journals, reports and accounts – electronic and hard copy)	7 years after end of the financial year to which the records relate	Finance	Time limits on litigation
Signed Annual Financial Statements	Indefinitely	Finance	Good practice
Subsidiary companies – Statutory records	Indefinitely	Finance	Good practice

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Internal and external audit reports	7 years after end of the financial year to which the reports relate	Finance	Good practice
Contracts	Termination of contract plus 7 years	Finance	Time limits on litigation
Tenders	7 years	Finance	Time limits on litigation
External funding agreements/ grants (including applications, contracts and returns)	Non ESF grants: 7 years after end of the financial year to which the records relate, or longer period if required by the funder	Finance	Time limits on litigation
ESF Grants and matched funding agreements	7 years after the final payment under the programme (i.e. 31 Dec 2030 for the current 2016-2018 funding programme). This period may be extended – check before destroying records.	Finance	ESF funding requirements DWP Provider Guidance Chapter 11 Para 12
General insurance records	7 years following the expiry of the policy	Finance	Time limits on litigation
Employer's Liability insurance	40 years from the start/renewal of the policy	Finance	

6. STUDENT RECORDS¹

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
ENQUIRIES, APPLICATIONS, ADMISSIONS & INDUCTION			
Records documenting the handling of enquiries from prospective students attending Open Events or requesting directories	1 year after course ends	Enrolment Centre – Pro Solution	Good practice
Records documenting the handling of applications for admission: unsuccessful applications	1 year after course ends	Enrolment Centre – Pro Solution	Good practice
PAPERBASED STUDENT FILES COLLATED DURING ACADEMIC CAREER			
Full student records, including documents relating to: <ul style="list-style-type: none"> Application/admission Forms & Interview Records 	6 years after course ends unless directly or indirectly (match) funded by the ESF where documents need to	Enrolment Centre MIS Office	Limitation period for negligence. ESF funding requirements (for potentially ESF matched funding)

¹ Student Records for sub-contracted provision will be consistent with the nature of the sub-contracting agreement.

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
<ul style="list-style-type: none"> Enrolment/Learning agreement/Files Employer Liability/H&S (apprenticeships) Contact/Attendance (paper based) Change of personal details Diagnostic/Assessments/ILP Qualifications on Entry Transfer, withdrawal or termination of studies Academic achievements Reference requests/responses 	be retained until 31 st December 2030		
ELECTRONIC STUDENT FILES COLLATED DURING ACADEMIC CAREER			
Scanned copy of full student records including documents relating to: <ul style="list-style-type: none"> Application/admission Enrolment/Learning agreement/Files Employer Liability/H&S (apprenticeships) Contact/Attendance (paper based) Change of personal details Diagnostic/Assessments/ILP Qualifications on Entry Transfer, withdrawal or termination of studies Academic achievements Reference requests/responses 	10 years after course ends unless directly or indirectly (match) funded by the ESF where documents need to be retained until 31 st December 2030 This period may be extended – check before destroying records.	Enrolment Centre MIS Office	Limitation period for negligence. ESF funding requirements (for potentially ESF matched funding) Permits College to provide references for a reasonable length of time. DWP Provider Guidance Chapter 11 Para 12
NETWORK ACCOUNT CREATION			
<ul style="list-style-type: none"> Student Network account Student home area Student OneDrive account 	Current academic year or length of programme, plus 3 months	ICT Services	ICT security, good practice and to accommodate re-enrolment onto new programmes in the following academic year.
<ul style="list-style-type: none"> Staff Network account Staff home area Staff OneDrive account 	Length of employment plus 1 month		ICT security, good practice and to accommodate overlaps in changes in roles.
<ul style="list-style-type: none"> Generic Exams Network account 	To be activated after each exams period.		ICT security and good practice.
<ul style="list-style-type: none"> BKSB generic Network account 	Perpetual		Operational need.
MOODLE			
Student account	Current academic year plus 3 months or length of programme.	MIS	Good practice.

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Courses	1 academic year plus the current year unless individual courses are requested for longer by the course manager.	MIS.	Moodle is not designed to be a storage service and older material may not be supported by future enhancements/upgrades.
Archived courses	3 academic years	MIS	Good practice.
eILP			
<ul style="list-style-type: none"> • Personal details • Course details • Quals on entry • Exam results • Attendance records • Additional notes • Progress reviews • Learning plan • At risk comments/flag • Additional Support meetings/strategies • Disciplinary details • SMART Targets 	1 academic year plus the current year	MIS	Good Practice
PROGRAMME & EXAMINATION ADMINISTRATION (inc Work/Study Placements)			
Documents referring to coursework marks/grades and assessment.	6 years after course ends	Curriculum areas	Good practice.
Electronic records of coursework assessment marks/grades held within ProMonitor Markbook.	6 years after course ends	MIS	Good practice.
Electronic records of coursework assessment marks/grades held outside of ProMonitor Markbook.	6 years after course ends	Curriculum areas	Good practice.
Records documenting organisation of students' work/study placements.	6 years after course ends	Curriculum areas	Good practice.
Records documenting organisation of examination facilities (inc. special arrangements); attendance at examinations; handling of impaired performance claims; collation and notification of results.	6 years after course ends	Examinations	Good practice.

7. QUALITY ASSURANCE

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Student Records Records documenting the conduct and results of disciplinary proceedings against individual students.	Current Academic Year plus 6 years.	Curriculum areas/ Principal's Office	Limitation period for negligence.

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Student Records Records documenting the handling and results of academic appeals by individual students.	Current Academic Year plus 6 years.	Assistant Principal for Teaching, Learning and Quality	Limitation period for negligence.
Student/Employee Records Records documenting the handling of formal complaints & compliments made by individual students.	Last action on complaint plus 6 years.	Quality Team	Limitation period for negligence/JISC Guidance.
Student/Employee Records Records documenting the handling of complaints made by individual students where formal complaints procedure is not initiated.	Last action on complaint plus 3 years	Quality Team Curriculum areas	JISC Guidance.
Employee Records Electronic records of TLO Observations.	Current Academic Year plus 6 years	Quality Team	Good practice and JISC Guidance.
Employee Records Electronic records of Learning Walks / Walkthrough Records	Current Academic Year plus 6 years	Quality Team	Good practice and JISC Guidance.
Employee Records Electronic records of Advanced Practitioner or equivalent Support.	Current Academic Year plus 6 years	Quality Team Advanced Practitioners	Good practice.
Employee/Quality/Student Records Electronic and paper Ofsted Inspection Records.	See individual categories.	Quality Team	Good practice.
Quality/Student Records Electronic and paper Curriculum & Apprenticeship Monitoring Meeting Records .	Current Academic Year plus 5 years	Quality Team	Good practice and JISC Guidance.
Employee/Quality/Student Records Electronic records of EV Reports.	Current Academic Year plus 6 years	Quality Team	Good practice and JISC Guidance.
Employee/Quality/Student Records Electronic and paper records of IQR reports.	Current Academic Year plus 5 years	Quality Team	Good practice and JISC Guidance.
Employee/Quality Records Electronic records of Essential Training.	Expiry of certification plus 6 years OR Superseded plus 6 years	Quality Team	JISC Guidance.
Quality Records Electronic records of Student Survey Results.	Completion of survey plus 5 years	Quality Team	JISC Guidance.
Employee/Quality Records Electronic and paper records of CPD Requests.	Completion of actions plus 5 years	Quality Team	JISC Guidance.

8. GENERAL (Non-financial records)

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Minutes, papers and other records of Corporation meetings and its committees	10 years after the last meeting	Clerk to the Corporation	Good Practice

9. STUDENT SERVICES

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
Bursary fund claims and payments	6 years after the end of the course.	Student Services	Good practice.
Learning Support records	6 years after the end of the course.	Student Services	Good practice.
Additional Support records	6 years after the end of the course.	Student Services	Good practice.
Safeguarding documents/records	<p>Copies of reports, notes etc. should be kept securely locked at all times and then retained until the 25th anniversary of the child's birth, or if the child dies before age 18, for 6 years from the date of death.</p> <p>Copies of reports, notes etc. for 'Children Looked After' are to be kept for either the 75th anniversary of the child's birth, or if the child dies before age 18, for 15 years from the date of death.</p> <p>Copies of reports regarding allegations made against staff shall be kept securely until at least the 25th birthday of any child or seven years in any other case.</p> <p>Records should then be securely disposed of and a record of disposal kept. Paper records should be</p>	Designated Manager for Safeguarding	Child Protection Legislation

Type of Record	Minimum Retention Period	Responsibility	Reason for Length of Period
	shredded and electronic records deleted.		

10. Appendices:

Appendix 1:

Appendix 2:

Appendix 3:

Appendix 1: EQUALITY & DIVERSITY IMPACT ASSESSMENT

This template has been designed to help you take action to improve services and practices which affect staff, students and other service users at Northampton College. By completing this template, you would have considered the impact that your policy, practice or service might have on particular social groups within the college community. The exercise will also provide you with the opportunity to demonstrate, where possible, that the College promotes equity, diversity and inclusion.

Once this Equality Impact Assessment has been created, please include on the last page of your policy document.

Policy Details	
What is the policy?	Data Retention Guidelines
Is it new or existing?	Existing
Department	Finance & Corporate Affairs
Policy Author (postholder title, name)	Julian Wood, Deputy Principal - Finance & Corporate Affairs
Author of Equality Analysis	Julian Wood
Date of completion	May 2023

Aim and Objectives
Briefly describe the aims and objectives of the policy
To be transparent about the minimum retention periods of data.

Policy Assessment				
Consider whether your policy might have an impact on various groups identified within the categories listed below and explain why you have reached this conclusion. Please tick (✓) the identified level of impact (positive, negative, or no impact) and provide details of your findings.				
	Positive Impact	Negative Impact	No Impact	Findings
Race			Y	
Religion and/or belief			Y	
Sex (Gender)			Y	
Gender Identity			Y	
Disability			Y	
Age			Y	
Sexual orientation			Y	
Marriage and/or civil partnership			Y	
Pregnancy and/or maternity (including surrogacy and adoption)			Y	
Other identified group (e.g. carers)			Y	

Action Planning		
How do you intend to mitigate or eliminate any negative impact identified?	If a positive impact is identified, how do you intend to promote or develop this opportunity?	Where negative impact has been identified, can it be justified? If so, explain how.

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Monitor and Review

How will you monitor the impact of your policy once it has been put into effect?
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The policy will be monitored through feedback from services users gathered via: subject access requests, complaints records, Freedom of Information records.
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Names and position of Impact Assessment Team (min of 3 preferably from areas across the College):

Name	
Julian Wood	Deputy Principal - Finance & Corporate Affairs
Carol Meadows	Director of MIS
Alex Summers	Enrolment Centre Manager

Equality Analysis Sign-Off Signature and Date:	May 2023
Review Date:	May 2024

Appendix 2: DATA PROTECTION IMPACT ASSESSMENT

Data Protection Impact Assessment

Does this Policy

- require the collection and use of data in addition that normally collected by the College?

Yes / No (if Yes complete Assessment point number 1)

- require the sharing of data with partners?

Yes / No (if Yes complete Assessment point number 2)

1. Is additional data being collected? If so please detail:

No

Is data collected personal and/or sensitive?

n/a

How will you collect, use, store and delete data?

n/a

2. Will you be sharing data with anyone? Please detail what data, with who and confirm a **Data Sharing Agreement** is in place

n/a

Describe the purposes of the processing / sharing: What are the benefits of the processing/ sharing – for you, and more broadly?

n/a

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so.

n/a

Describe compliance and proportionality measures, in particular:
What is your lawful basis for processing?

n/a

How will you ensure data quality and data minimisation?

n/a

What information will you give individuals?

n/a

Please attach a Risk Assessment if there are significant risks to data protection

Signed by Data Protection Officer

Name: Julian Wood - Deputy Principal - Finance & Corporate Affairs

Date: May 2023

Appendix 3: COMMUNICATIONS PLAN

TITLE OF COLLEGE POLICY: Data Retention Guidelines	DATE APPROVED BY Date: May 2023
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AUDIENCE (select appropriate with √)				
Managers		Curriculum teams		Business Support teams
All staff	Y	Suppliers		Partners
Other - Students	Y			

CHANNEL (select appropriate with √)				
Policy & Strategy Team (PST)	Y	Quality Improvement Network (QIN)		Marketing team
Meeting	Y	Meeting		NC Update Intranet Website
Individual team		Suppliers		Partners
Document Library Noticeboards Team meeting Email		e.g. Letter or email Meeting		e.g. Letter or email Meeting
College Management Team (CMT)		JCNC		CORPORATION
Meeting		e.g. Meeting Email		e.g. Meeting Email

COMMUNICATIONS PLAN ACTIVATED BY:		
Name: Julian Wood Department Finance & Corporate Affairs	Job title: Deputy Principal - Finance & Corporate Affairs	Date: May 2023

