



# Document Retention Policy

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## **Data Retention Schedule**

Wirral Metropolitan College recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the College. This document provides the policy framework through which this effective management can be achieved and audited.

### **1. Scope of the Policy**

This policy applies to all records created, received or maintained by staff at the College in the course of carrying out its functions.

- Records are defined as all those documents which facilitate the business carried out by the College and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- A small percentage of the College's records may be selected for permanent preservation as part of the institution's archives possibly for historical research.

### **2. Responsibilities**

- The College has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The Assistant Principal - MIS has overall responsibility for this policy.
- The person responsible for records management in the College will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and timely.
- Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the College's records management guidelines.

### **3. Relationship with Existing Policies**

This policy has been drawn up within the context of:

- Freedom of Information Policy
- Data Protection Policy (the Data Retention Policy should be read in conjunction with the Data Protection Policy)
- Other legislation or regulations (including audit, equal opportunities and ethics) affecting the College

### **4. Safe Disposal of Records**

Where records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information, should be shredded before disposal using a shredder. The Freedom of Information Act 2000 requires the College to maintain a list of records which have been destroyed and who authorised their destruction.

Members of staff destroying records in line with this policy should record at least:

- File reference (or other unique identifier)
- File title (or brief description) and number of files
- The name of the authorising officer and the date action taken
- Where electronic records are deleted, the parameters for the record deletion should be retained and dated

## **5. Current year plus 6 Academic Years (16-18 year olds only)**

A vital part of the College's Data Protection Policy and practice is that personal data is retained for the appropriate period of time. The Data Protection Policy states that it is the College's policy to:

- Retain all information only for as long as specified in the Data Retention Schedule and, in general, no longer than five years plus the current year

This document is a summary of the Data Retention Schedule, and gives an indication of the kind of personal data which needs to be retained for longer than the maximum six years stipulated in the Policy.

Personal data should not be held for more than six years after it ceases to be current, unless there is a specific reason for doing so (see Section 3 for the specific categories requiring different retention periods). The definition of current will vary according to the personal data: for example, it will mean until the course has finished where it relates to students, or until a member of staff has ceased being employed by the College where it relates to staff.

## **7. ESF document retention (including ESF co-funding AEB students)**

Wirral met as an ESF grant recipient are required to provide records to evidence that the claims expenditure complies with the relevant regulations and terms of the Funding Agreement, to enable the Managing Authority to meet its reporting obligations and to demonstrate compliance with EU requirements.

Record retention is an important consideration for a project funded by ESF. Projects can be subject to an audit after the project is completed and it is therefore a requirement of grant that certain documents are retained and made available for inspection over the entire period. Failure to produce adequate and satisfactory evidence can result in the repayment of grant. For projects delivered by a consortium of partners, it is the Grant Recipient (GR) organisation that is responsible for the audit trail. The GR must make sure that any sub-contractors keep adequate records. To do this, they will need to show that they have systems in place to verify the information provided and held by partners.

Wirral Met's ESF project records and AEB ESF co-financed records must be retained until **31<sup>st</sup> December 2030**.

Prior to the destruction of any ESF or AEB documents, confirmation of destruction should be gained from the Assistant Principal MIS.

ESF/AEB documents to be retained:

*Uncontrolled document when printed, refer to staff intranet for current version*

- all ESF related documentation including work carried out during the development, pre application, application and during and after the project
- the Funding Agreement including any revised versions supported by appropriate correspondence from DWP of the approval of changes to the Funding Agreement
- correspondence from/to the Managing Authority
- monthly claim forms;
- claim calculations
- audit trails
- project expenditure
- evidence of match funding
- compliance with publicity requirements
- compliance with equal opportunities and environmental sustainability requirements