

Records Management Policy and Procedure

July 2017

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Version Control History

Version Number	Date of Change	Summary of Revisions Made
3	April 2016	Minor Changes to appendix 3 Quality Area. Footer remained Stat.
3.1	July 2016	Footer updated to reflect new template model.
4	December 2016	Following routine scheduled review; the following minor changes were made: <ol style="list-style-type: none">1 In Appendix 3 Freedom of Information: changes in retention periods for correspondence, legal and court papers.2 In Appendix 3 Quality: addition of retention periods for SQA documentation in Appendix.3 Job titles refreshed throughout to match current organisational chart.
4.1	July 2017	Minor changes were made to Appendix 3 relating to retention of quality related documentation for appeals and malpractice records.

Records Management Policy

1 Purpose

The College requires to keep records to ensure effective operation and accountability, retaining essential evidence of the College's activities and transactions. The aim of this policy is to outline minimum standards for efficient and cost effective retention and control of records from creation to the date of disposal, or archiving, where appropriate.

2 Scope

- 2.1 This policy applies to all recorded data which is created, collated, processed, used and retained in the course of College business. This can include paper, electronic, digital, and multimedia records.
- 2.2 Records Management is the practice of maintaining the records of an organisation from the time they are created up to their eventual disposal. This may include classifying, storing, securing, and destruction (or in some cases, archival preservation) of records.
- 2.3 Appendix 3 details staff responsible for retention and management of various records. Records should not be kept for any longer than the maximum retention period specified in Appendix 3.
- 2.4 The policy covers all records retained and managed by the College.

3 Definitions

- 3.1 **Archives**
Records that are recognised as having long-term (including historical and cultural) value.
- 3.2 **Data Protection Act 1998**
Provides legal rights to individuals with regard to the personal information held about them by others.
- 3.3 **Disposal**
The process of destroying records at the end of the appropriate retention period.
- 3.4 **Freedom of Information (Scotland) Act 2002**
Provides a general statutory right of access to information of any age and in any format held by Scottish public authorities, subject to a number of limited exemptions.
- 3.5 **Non-current Records**
Those records which have little or no business value, though they may be used for other purposes, such as historical research.

3.6 **Records**

Any data held by the College in any format. They may relate to individuals, statistics, finance, procurement or any other aspect of College business.

3.7 **Records Management**

The field of management responsible for the efficient and systematic control of the creation, maintenance, use and disposition of records.

3.8 **Retention Periods**

An index to different types of records, detailing how long they should be kept for in order to meet operational and legal requirements.

3.9 **Vital Records**

Those records crucial to the conduct of the College's business and without which the College would be unable to function should they be destroyed by fire, flood or any other catastrophe.

4 **Key Principles**

Each area of the College must have in place adequate arrangements for documenting its activities, with due regard to any relevant legal and regulatory instruments which may apply. Arrangements will reflect the following aspects.

4.1 **Record Creation**

- Appropriate records, arranged and indexed for rapid retrieval.
- Procedures for keeping the system updated.
- Appropriate staff training for those who use the system(s).
- Retention periods (see Appendix 3).
- The process for creating and maintaining a robust records system is outlined in Appendix 1.

4.2 **Records Maintenance**

Appropriate storage facilities, which allow access for relevant staff, but are secure enough to comply with Data Protection Law (see the College Data Protection Policy).

Identify vital records and apply appropriate protection, including backup if applicable.

4.3 **Records Closure**

Records should be closed as soon as they have ceased to be of active operational use (usually after no more than 4 years). Non-current records should then be moved to designated storage facilities.

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4.4 Retention Periods

The College will retain permanently records which are essential to the College and which document policy, structure and process, including:

- Legal status and remit.
- Principal administrative processes.
- Top level decision making and policy formation.
- High profile aspects of interactions between the College and its major partners or community.

Realistic retention periods for records should be decided as records are created; Appendix 3 may be used as a guide.

Consideration should be given to the following factors:

- Is the record required for day to day running of the College?
- Is the record required for legal purposes, eg invoices, major contracts?
- Is there legislation that governs how long the record should be kept, eg European grant funding records?
- Is it liable to be of ongoing public interest (Freedom of Information)?

At the end of the retention period, an appraisal process should be undertaken to decide if the records should be retained for longer, archived or destroyed. A schedule should be retained to record this process (see Appendix 2).

4.5 Disposal

All records authorised for disposal must be destroyed in as secure a manner as is necessary for the level of confidentiality or security they merit. This applies to electronic records as well as physical records.

5 Responsibilities

- 5.1 The Freedom of Information Officer is responsible for the design, implementation and maintenance of this policy. The Freedom of Information Officer will also be responsible for staff awareness of records management issues to ensure that they are aware of their obligations in this area.
- 5.2 All Directors and Managers are responsible for monitoring the creation, security and disposal of records retained in their department.
- 5.3 All College staff are responsible for ensuring that records created in the course of their normal duties are accurate and up to date.
- 5.4 The Quality approval check of the final policy is the responsibility of the Head of Quality who will arrange for the policy to be posted on the web.

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6 **Linked Policies/Related Documents**

Data Protection Policy and Guidance
Data Protection Subject Access Request Procedure
Freedom of Information Model Publication Scheme
Environmental Information Regulations Policy

7 **Relevant Legislation**

Freedom of Information (Scotland) Act 2002
Data Protection Act 1998

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Appendix 1

Active Records Management Process

Inventory

- Identify record classes.
- Do copies exist? Ascertain master copy.
- Establish location and ownership.
- Identify retention obligations; statutory, regulatory or public interest.
- Review existing retention practice; is the current retention period appropriate?

Storage

- Storage arrangements should allow for easy retrieval.
- Location should be secure, in line with the confidentiality and/or sensitivity of the information.
- Ensure environmental conditions are appropriate to avoid potential damage to the records.

Appraisal and Disposal

- At the end of the retention period, the relevant manager should appraise records and mark for further retention, archival or disposal as appropriate.
- Record activity using form available at Appendix 2.

Appendix 3: Retention Periods

Board of Management				Comments eg Refer to Statutory Requirements
Responsible Officer: Clerk to the Board.				
Description of Records		Retention Periods		
Governance				
1	Board members – application forms.	1	Duration of membership + 2 years.	
2	Register of Interests for Board Members.	2	Duration of membership + 2 years.	
3	Constitution for Board of Management.	3	Current version.	
4	Standing Orders and Operating Guidelines.	4	Current version.	
5	Code of Conduct.	5	Current version.	
6	Training records for Board members.	6	Duration of membership + 2 years.	
7	Agendas and Reports for Board of Management and Committees.	7	Current + 5 years.	
8	Minutes for Board of Management and Committees.	8	Permanent from 2000.	
9	Correspondence from ASC.	9	Current + 3 years.	

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Estates				
Responsible Officer: Head of Estates				
Description of Records		Retention Periods		Comments eg Refer to Statutory Requirements
General				
1	College Titles (for buildings).	1	Permanent until disposal of property.	
2	Site Plans.	2	Permanent until disposal of property.	
3	Estates Strategy.	3	Current version.	
4	Accommodation Schedules.	4	Current version.	
5	Capital Project Documentation.	5	End of defects liability period + 10 years.	
6	Project Safety File.	6	Permanent.	
7	SFC funding allocation>Returns.	7	Current + 3 years.	
8	UHI funding allocation>Returns.	8	Current + 3 years.	
9	E-mandate Returns.	9	Current + 1 year.	

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Estates (contd)				Comments eg Refer to Statutory Requirements
Description of Records		Retention Periods		
Contracts				
1	Tender Documentation.	1	Duration of Project + 3 years.	
2	Tender Documents – successful tenderer.	2	Termination of Contract + 3 years.	
3	Tender Documents – unsuccessful tenderers.	3	Current year + 1 year.	
4	Term Contractors inc Insurance and Health and Safety details.	4	Current + 3 years.	
5	Planning/Building Warrants.	5	Permanent.	
6	Lease Agreements.	6	Permanent.	
7	Documents including photographs of key institutional importance.	7	Permanent.	
8	Agreements with other colleges and stakeholders.	8	Termination of Agreement + 3 years.	
9	General Correspondence.	9	Current + 3 years.	

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Finances				
Responsible Officer: Vice Principal, Finance and Estates				
Description of Records	Retention Periods		Comments eg Refer to Statutory Requirements	
Payroll				
Staff Information				
1	Staff Timesheets evidencing project activity.	1	7 years.	
2	Staff Payroll and Hourly Rate Information.	2	7 years.	
3	Request for Additional Staff Resources.	3	7 years.	
4	Staff Travel Claim Forms for project activity.	4	7 years.	
5	Statutory Maternity Pay Records, Calculations (MAT B1s) or other medical evidence.	5	7 years.	
6	Statutory Sick Pay Records, calculations, SSP1 forms.	6	7 years.	
7	Wage/salary records (also overtime, bonus and expenses).	7	7 years.	
8	PAYE, NI, Pension Records.	8	7 years.	

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Finances (contd)		Retention Periods		Comments eg Refer to Statutory Requirements
Description of Records				
Income and Expenditure				
General				
1	Supplier/Purchase Ledger Statements.	1	2 years.	
2	New Supplier Details (inc Bank Details).	2	7 years.	
3	Weekly payment run (BACS/Cheque) paperwork.	3	7 years.	
4	Debt files (third party debt recovery agency).	4	7 years.	
5	Monthly Bank Reconciliation files.	5	2 years.	
6	Cash Sheets/Telebanking files	6	7 years.	
7	Banking and petty cash record.	7	7 years.	
8	Budget working papers.	8	5 years.	
9	Cash flow working papers.	9	5 years.	
10	Funding Council returns.	10	7 years.	
11	Statistical returns.	11	7 years.	
12	Year End Accounts working papers	12	7 years.	
13	VAT returns.	13	7 years.	
14	Reclaimed VAT paperwork.	14	7 years.	
15	Virements.	15	3 years.	
16	Journal File.	16	7 years.	
17	Bank Statements.	17	7 years.	
18	Examination fee payments	18	7 years.	
19	Invoice Requests (UHI EC).	19	7 years.	
Audit				
1	Correspondence to External Auditors.	1	7 years.	
2	Correspondence to Internal Auditors.	2	Term of Appointment + 1 year.	

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Freedom of Information				
Responsible Officer: Freedom of Information Officer				
Description of Records		Retention Periods		Comments eg Refer to Statutory Requirements
Freedom of Information				
1	Correspondence.	1	Current + 2 years.	
Data Protection				
1	Correspondence.	1	Current + 1 year.	
2	Legal/Court Correspondence	2	Current + 2 years.	
Environmental Information Regulations				
1	Correspondence.	1	Current + 2 years.	

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Health and Safety				
Responsible Officer: Health and Safety Officer				
Description of Records		Retention Periods		Comments eg Refer to Statutory Requirements
1	Local health and safety committee minutes, agenda and papers.	1	5 years.	After creation.
2	Local copy of annual health and safety report questionnaire.	2	3 years.	After creation.
3	Local accident report record (eg in an accident book or electronic confirmation from online reporting system).	3	3 years.	After last entry in book or, for standalone reports, after date of incident.
4	Risk assessments (including fire safety).	4	5 years.	After superseded by next risk assessment or after activity ceases.
5	Portable appliance testing records.	5	Current test and proceeding.	After termination of appointment/after the person gives up the post of fire marshal.
6	Record that a member of staff has attended fire training.	6	6 years.	

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Human Resources				
Responsible Officer: Vice Principal, Human Resources and Communications				
Description of Records		Retention Periods		Comments eg Refer to Statutory Requirements
1	Personal Files	1	Current + 10 years for leavers.	
	1 Contractual information.			
	2 Job Description.			
	3 New Start information (H&S Receipt, Personal Details etc).			
	4 References.			
	5 Application form and supporting documentation.			
	6 Annual leave sheets.			
	7 Sickness absence and occupational health records.			
	8 Staff review documentation.			
	9 Conduct records (removed from personal file once spent).			
	10 Grievance records.			
	11 Termination information			
	12 HRWS audit information.			
	13 Re-grading information.			
	14 Letters and memos relating to above.			

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Human Resources (contd)				Comments eg Refer to Statutory Requirements
Description of Records		Retention Periods		
2	HR Strategy	2	Current + 3 years.	
	1 HR Strategy			
	2 HR Operational Plan			
	3 HR Self-Evaluation			
	1 Internal Customer Evaluation.			
	2 HR Team Meetings.			
3	Recruitment Files	3	6 months.	
	1 ATR.			
	2 Job Description.			
	3 Application forms and supporting documents (successful applicant details as per 1 above).			
	4 Shortlisting summary sheet.			
	5 Interview Summary sheet.			
6 Equality and Diversity Monitoring.				
4	Disclosure Scotland Documentation	4	90 days following receipt.	
5	Staffing Committee Documentation	5	Current session + 7 years.	
	- Working papers.			
	- Committee papers.			
	- Committee minutes.			

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Human Resources (contd)				Comments eg Refer to Statutory Requirements
Description of Records		Retention Periods		
6	JCC/JNC/RPA	6	Current session + 7 years.	
	1 Working papers.			
	2 Committee papers.			
7	Policies and Procedures	7	Current version + previous version.	
	1 Impact Assessment papers.			
	2 Policies and Procedures.			
8	HR Policy Review Group	8	Current session + 3 years.	
	1 HRPRG papers.			
	2 HRPRG notes.			
9	Restructuring Information	9	Current session + 7 years.	
	1 Information relating to specific members as per 1 above.			
	2 Sectional/Directorate information.			
10	HR Budget Information	10	Current session + 3 years.	
11	Specific Projects	11	While projects remain live + 5 years.	
12	Terms and Conditions Information	12	Permanent from date of incorporation (1993).	

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Management Information Systems (MIS)					
Responsible Officer: Head of Student Records				Comments eg Refer to Statutory Requirements	
Description of Records		Retention Periods			
Paper Documents					
1	Enrolment Forms.	1	Current + 2 years.	Enrolment forms: some are now being captured electronically. New legislation now dictates that we need to keep enrolment forms for at least Moving to 'Current + 4 years on SFC recommendation June 2011.	
2	Fee Waiver Forms.	2	Current + 2 years.		
3	Withdrawal/Transfer Forms.	3	Current + 2 years.		
4	Change of Address/Personal Details Forms.	4	Current + 2 years.		
5	Result Sheets.	5	Current + 2 years.		
6	Course Frameworks.	6	Current + 2 years.		
7	Attendance Registers.	7	Current + 2 years.		Majority of attendance now being captured electronically from 2009-10.
8	FES Returns.	8	Current + 6 years.		
9	Tuition Fee Records (eg Invoices).	9	Current + 2 years.		
10	Group Award Entry Forms.	10	Current + 2 years.		
11	New Course Form.	11	Current + 2 years.		

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Management Information Systems (MIS) (contd)				
Description of Records		Retention Periods		Comments eg Refer to Statutory Requirements
Electronic Documents (including Crystal Reports)				
1	Attendance Registers.	1	SITS*.	Supported/maintained on SITS.
2	Attainment Reports.	2	SITS*.	Supported/maintained on SITS.
3	Performance Indicator Reports incorporating Equal Opportunities.	3	SITS*.	Supported/maintained on SITS.
4	Application Reports.	4	SITS*.	Supported/maintained on SITS.
5	Course target setting.	5	Current + 3 years.	Maintained on spreadsheets.
6	Monitoring reports (target 'v' actual).	6	Current + 3 years.	Maintained on spreadsheets.
7	Miscellaneous/ad-hoc reports.	7	SITS*.	Supported/maintained on SITS.
8	Tuition Fee Records – Symmetry**.	8		Supported/maintained on Symmetry.
9	Tuition Fee Records – SITS*.	9	SITS*.	Supported/maintained on SITS.
Scottish Funding Council ESF Projects				
1	Enrolment Forms.	1	Current + 9 years.	
2	Attendance Registers.	2	Current + 9 years.	

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Principal's Office				Comments eg Refer to Statutory Requirements
Responsible Officer: Principal PA				
Description of Records		Retention Periods		
Planning				
1	Strategic Plans.	1	Current + 3 years.	
2	Operational Plans.	2	Current + 3 years.	
SFC				
1	Correspondence.	1	Current + 3 years.	
2	Funding.	2	Current + 3 years.	
3	Returns.	3	Current + 3 years.	
UHI				
1	Correspondence.	1	Current + 3 years.	
2	Correspondence for Board of Management.	2	Current + 3 years.	
HMIE				
1	Review Documentation	1	Current + 5 years.	
Contracts				
1	SNIEPF/CITB, SECTT, etc.	1	Current + 3 years.	

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Principal's Office (contd)				Comments eg Refer to Statutory Requirements
Description of Records		Retention Periods		
Insurance				
1	Insurance Policies.	1	Current policy + 6 years.	
2	Annual Renewal Agreement.	2	Current + 3 years.	
3	General Correspondence.	3	Current + 6 years.	
Health and Safety				
1	Business Continuity Plan.	1	Current version.	
SFC				
1	Circulars.	1	Current + 3 years.	
2	Correspondence.	2	Current + 3 years.	
Projects				
			7 years.	

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Quality				
Responsible Officer: Head of Quality				Comments eg Refer to Statutory Requirements
Description of Records		Retention Periods		
1	Complaints	1	Current year + 3 years.	
Student Assessment/ Student Code of Conduct				
2	Student submitted assessed work	2	Current year + 1 year	All student evidence, coursework, projects and exam scripts (including observation checklists) and internal verification records. *Any assessment appeals, malpractice records must be kept for the specified time-period.
3	Student submitted assessed work relevant to SVQ/NVQ/Skills for Work Units	3	3 weeks past candidate Group Award completion date	All student evidence, including observation checklists and Knowledge and Understanding question papers, and internal verification records.
4	If student submitted assessed work is subject to a mitigating circumstances claim	4	Current year + 1 year	NB: claims for SVQ/NVQ/Skills for Work Units must be retained in line with student submitted assessed work.
5	If student submitted assessed work is subject to an assessment appeals	5	8 years after cases and any appeals has been heard	Includes other procedural or legal challenge and all records relating to the appeal. All assessment and internal verification records should be retained for this period. Claims for SVQ/NVQ/Skills for Work Units must be retained in line with student submitted assessed work.

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6	If student submitted assessed work is subject to an student disciplinary for academic malpractice/maladministration	6	3 years, or if student appeals to awarding body on decision then 5 years	NB: if this resulted in a criminal conviction then records must be held for 6 years. All assessment and internal verification records should be retained for this period. Claims for SVQ/NVQ/Skills for Work Units must be retained in line with student submitted assessed work.
7	If a student is suspected and/or found guilty of a breach of code of conduct with respect to their behaviour	7	Current year + 1 year	All records relating to the investigation
8	If a student is subject to a Fitness to Study investigation	8	Current year + 5 years	All records relating to the investigation.
9	External verification reports	9	Current year + 3 years.	Should be held in the relevant master folders.
10	Internal verification records	10	Current year + 3 years	All past years other than current year should be archived in the master folders.
Quality Assurance				
11	Course Committee minutes.	11	Current year + 3 years.	
12	Annual Course Reports (including HE SEDs).	12	Current year + 3 years.	
13	Self-evaluation reports, including SORs.	13	Current year + 3 years.	
14	Course reviews	14	Current year + 3 years.	
15	Quality Reviews	15	Current year + 3 years	
16	Course approval and validation reports	16	Validation period + 1 year	If no validation period noted then current year + 6 years.
17	Internal audit documentation.	17	Current year + 2 year.	NB: SVQ/NVQ/Skills for Work Units must be retained in line with student submitted assessed work.

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Candidate Assessment Records				
18	Student submission records for assessed work	18	1 calendar year following completion of qualification	Any assessment appeals, malpractice, compliant then records must be kept for the specified time-period.
19	Individual notification of awards records	19	1 calendar year following completion of qualification	Any assessment appeals, malpractice, complaint then records must be kept for the specified time-period.
20	Ofqual regulated qualification	20	3 years following completion of qualification	Any assessment appeals, malpractice, complaint then records must be kept for the specified time-period.
21	Pass lists/award lists	21	Issue of list + 10 years	

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Student Services				
Responsible Officer: Head of Student Services				
Description of Records		Retention Periods		Comments eg Refer to Statutory Requirements
1	Personal Learning Support Plan containing:	1		
i	School Reports.	i	Current year + 5 years.	Statutory.
ii	Medical Reports.	ii	Current year + 5 years.	Statutory.
iii	Psychologist Reports.	iii	Current year + 5 years.	Statutory.
iv	DSA/SAAS Funding Reports.	iv	Current year + 5 years.	Statutory.
2	Child Protection.			
i	Correspondence.	i	Current year + 5 years.	
Student Guidance/Finance				
1	Student Interview Sheet.	1	Current + 3 years.	
2	Student Funding Application Forms FE.	2	Current + 3 years.	
3	Student Funding Application Forms HE.	3	Current + 3 years.	
4	Beneficiary Application Forms (including Travel and Childcare Declaration forms, copies of Bursary and SAAS award letters).	4	Current + 6 years.	
5	Correspondence to Beneficiaries.	5	Current + 6 years.	
6	Student payments direct debits.	6	Current + 6 years.	
7	BACS Printouts to prove processing of Beneficiary Payment (if applicable).	7	Current + 6 years.	

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Student Services (contd)				Comments eg Refer to Statutory Requirements
Description of Records		Retention Periods		
Student Records				
1	Application forms.	1	Current + 3 years.	
2	Fee Waiver forms.	2	Current + 3 years.	
3	Copy of Fee Waiver evidence.	3	Current + 6 years.	
4	ILA Funded Course Records.	4	Current + 7 years.	
5	Student Criminal Convictions Declaration Form (unsuccessful applicants).	5	Admissions Cycle + 6 months.	
6	Student Criminal Convictions Declaration Form (successful applicants).	6	Period of Study + 6 months.	
Scottish Funding Council ESF Projects				
1	Bursary, Childcare and Discretionary Payment Details.	1	Current + 9 years.	
2	BACS Payments Details relating to 1 above.	2	Current + 9 years.	
3	All Correspondence Related to Support for Students through ESF Funding.	3	Current + 9 years.	
4	Evidence of ELS Support (eg PLSPs).	4	Current + 9 years.	

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Review Timing/Date: 2 Years/2018/19