



CORPORATE POLICIES AND PROCEDURES FRAMEWORK

Records Management and Archiving Policy and Procedure

Approval

Lead Officer (Post)	Director of Finance	Review Date	September 2017
Team:		Review Lead Officer	Estates and Facilities Manager
Category:	Corporate	Date Published	September 2014
Date approved by BoM:	24/06/2014	Equality Impact Assessment	

Reviewer	Date	Review Action/Impact	BoM approval

Review

Lead Officer (Post)		Review Date	
Team:		Review Lead Officer	
Category:		Date Published	
Date approved by BoM:		Equality Impact Assessment	

Reviewer	Date	Review Action/Impact
Quality	27/10/2015	Quality Responsibilities updated to meet all awarding body requirements

Records Management and Archiving – Policy and Procedure

WHC reserves the right to amend this policy at its discretion. The most up-to-date version can be downloaded from our website

Records Management - Policy and Procedure

1.0 Purpose

- 1.1 The purpose of this policy is to provide a framework to ensure that a records management function is established within the College. This will ensure that records are managed in a way that supports the sharing of knowledge and information. The policy aims to promote best practice and to allow the College to comply with its statutory obligations, mainly under the Freedom of Information (Scotland) Act 2002 and the Data Protection Act 1998.

2.0 Policy

- 2.1 West Highland College UHI recognises that recorded information is a key resource to effective operation and accountability, providing valuable evidence of the College's activities and transactions.
- 2.2 Records are vital to the College in its current and future operations, in meeting legislative requirements, for the purpose of accountability and for an awareness and understanding of its history and procedures. The College's Records Management Policy requires that records should only be kept for as long as they are needed for legal, business, or other reasons.
- 2.3 The long-term storage of records is very expensive, both in terms of the space occupied and the human resources needed to look after them.
- 2.4 This policy governs the retention and disposal of records by West Highland College UHI, to ensure records are managed in a systematic and cost-effective manner.

3.0 Scope

- 3.1 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.
- 3.2 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.
- 3.3 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.
- 3.4 The policy covers all records retained and managed by the College.

4.0 Responsibilities

- 4.1 The member of staff designated as 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

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their obligations in this area.

- 4.2 All Directors and Managers are responsible for monitoring the creation, security and disposal of records retained in their department.
- 4.3 All College staff are responsible for ensuring that records they create and receive are managed in accordance with this policy and conform to the guidance and procedures described.
- 4.4 The Estates and Facilities Manager is responsible for management of physical records including the transferral of, and retrieval of records from storage areas. .

This policy will be reviewed as necessary to ensure compliance with legislation and fulfilment of College requirements

5.0 Definitions

Data Protection Act 1998 - Provides legal rights to individuals with regard to the personal information held about them by others.

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.

Archives - Records that are recognised as having long-term (including historical and cultural) value.

Business Critical 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.

Disposal - The process of destroying records at the end of the appropriate retention period.

Non-Business Critical Records - Those records which have little or no business value, though they may be used for other purposes.

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.

Records Management - The process for the systematic management of all records and the information or data that they might contain.

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.

6.0 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:-

6.1 Record Creation

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- 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.

6.2 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.

6.3 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.

6.4 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, e.g. invoices, major contracts?
- Is there legislation that governs how long the record should be kept, e.g. 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).

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6.5 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.

7.1 Linked Policies/Related Documents

- Data Protection Policy
- Freedom of Information Model Publication Scheme
- Environmental Information Regulations Policy (Draft)

8.1 Relevant Legislation

- Freedom of Information (Scotland) Act 2002
- Data Protection Act 1988

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

Department and Responsible Officer	Description of Records	Retention Period	FOI ✓	Notes
Board of Management Responsible Officer: Clerk to the Board.				
Governance	Board members – application forms	Duration of membership + 2 years.		
	Register of Interests for Board Members.	Duration of Membership + 5 years.		Refer to Standards Commission Guidance
	Constitution for Board of Management.	Current version.		
	Standing Orders and Operating Guidelines.	Current version.		
	Code of Conduct.	Current version.		
	Training records for Board members.	Duration of membership + 2 years.		
	Agendas and Reports for Board of Management and Committees.	Current + 5 years.		
	Minutes for Board of Management and Committees.	Permanent from 2000.		
	Gifts and hospitality register	Duration of Membership + 5 years.		Refer to Standards Commission Guidance
	Correspondence	Current + 3 years.		

Appendix 3

Department and Responsible Officer	Description of Records	Retention Period	FOI ✓	Notes
Estates Responsible Officer: Estates & Facilities Manager				
General	Estates Strategy	Current version		
	Accommodation schedules	Current version		
	Records of security and property access	Current year + 2 years		
	Internal partner licence agreements	All versions for current tenant		
	Site plans	Permanent until disposal		
	Contractor files inc insurance & health and safety details	Current + 3 years		
	Planning & building warrants	Permanent		
	Equipment inventory – including disposals	Current version + 5 years		
	Inspections and maintenance records	Date of inspection + 3 years		
	Asbestos Inspections	Until superseded		
	Fire Risk Assessments	Current version		
	Fixed electrical testing records	Current		
	Portable appliance testing records	Current year		
	COSHH data safety sheets	Current version		
	Facilities services charge records	Current + 1 year		

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Department and Responsible Officer	Description of Records	Retention Period	FOI ✓	Notes
Finances Responsible Officer: Director of Finance				
Audit	Correspondence to External Auditors.	Current year + 6 years.		
	Correspondence to Internal Auditors	Term of appointment + 1 year.		
Payroll Staff Information	Staff Timesheets evidencing project activity.	Current year + 6 years.		
	Staff Payroll and Hourly Rate Information.	Current year + 6 years.		
	Request for Additional Staff Resources.	Current year + 6 years.		
	Staff Travel Claim forms for project activity.	Current year + 6 years.		
	Statutory Maternity Pay Records, Calculations (MAT B1s) or other medical evidence.	Current year + 6 years.		
	Statutory Sick Pay Records, calculations, SSP1 forms.	Current year + 6 years.		
	Wage/salary records (also overtime, bonus and expenses).	Current year + 6 years.		
	PAYE, NI, Pension Records.	75 years		
Income and Expenditure	BACS/cheque weekly payment run & paperwork.	Current year + 6 years.		
	Banking and petty cash record	Current year + 6 years.		
	Bank Statements.	Current year + 6 years.		
	Budget working papers	Current year + 6 years.		
	Cash flow working papers.	Current year + 6 years.		

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	Cash Sheets/Telebanking files.	Current year + 6 years.		
	Cheque & invoice requests	Current year + 6 years.		
	Debt files (third party debt recovery agency).	Current year + 6 years.		
	ESF project files	Current year + 14 years.		
	Journal File.	Current year + 6 years.		
	Monthly Bank Reconciliation files.	Current year + 6 years.		
	New Supplier Details (inc. Bank Details).	Current year + 6 years.		
	Payment card details	Destroy after processing		
	Reclaimed VAT paperwork.	Current year + 6 years.		
	Scottish Funding Council returns.	Current year + 6 years.		
	Supplier/Purchase Ledger Statements.	Current year + 1 year.		
	Statistical returns.	Current year + 6 years.		
	UHI claims	Current year + 6 years.		
	VAT correspondence	Indefinitely.		
	VAT returns	Current year + 6 years.		
	Virements	Current year + 1 year.		
	Year end Accounts working papers.	Current year + 6 years.		
	Statistical returns.	Current year + 6 years.		
	Examination fee payments.	Current year + 6 years.		

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Insurance	Annual renewal agreements	Current year + 3 years.		
	Employer's liability certificates	40 years.		
	Insurance policies	Current policy + 6 years.		
	General correspondence	Current year + 6 years.		
Risk Management	Risk register	Current year + 3 years.		
Data Protection	Subject access requests & general correspondence	Current year + 6 months (unless subject to legal proceedings)		
Freedom of Information	Requests for information and general correspondence	Completion of request + 3 years		
Environmental information regulations	Requests for information and general correspondence	Completion of request + 3 years		
Building Titles		Permanent until disposal of property		

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Department and Responsible Officer	Description of Records	Retention Period	FOI ✓	Notes
Health and Safety Responsible Officer: Health and Safety Officer				
	Health and safety committee minutes, agenda and papers.	Current year + 5 years		
	Local accident report record (eg in an accident book or electronic confirmation from online reporting system).	Current year + 5 years		
	Dangerous occurrences records and investigations	Current year + 5 years		
	Health & Safety Policy	Current version		
	Health & Safety Audit	Current version		
	Record that a member of staff has attended fire training.	6 years		
	Workplace assessments	Current year + 5 years		

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Department and Responsible Officer	Description of Records	Retention Period	FOI ✓	Notes
Human Resources Responsible Officer: Human Resources Manager				
Personal Files	Contractual information.	Current + 10 years for leavers.		
	Job Description.	Current + 10 years for leavers.		
	New Start information (H&S Receipt, Personal Details etc.).	Current + 10 years for leavers.		
	References.	Current + 10 years for leavers.		
	Application form and supporting documentation.	Current + 10 years for leavers.		
	Annual leave sheets.	Current + 10 years for leavers.		
	Sickness absence and occupational health records.	Current + 10 years for leavers.		
	Staff review documentation.	Current + 10 years for leavers.		
	Conduct records (removed from personal file once spent).	Current + 10 years for leavers.		
	Grievance records.	Current + 10 years for leavers.		
	Termination information.	Current + 10 years for leavers.		
	HRWS audit information	Current + 10 years for leavers.		
	Regrading information.	Current + 10 years for leavers.		
	Letters and memos relating to above.	Current + 10 years for leavers.		

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Disclosure Scotland	Protection of vulnerable groups checks	90 days following receipt.		
HR Strategy	HR Strategy.	Current + 3 years.		
	HR Operational Plan.	Current + 3 years.		
	HR Self-Evaluation.	Current + 3 years.		
	Internal Customer Evaluation.	Current + 3 years.		
	HR Team meetings.	Current + 3 years.		
Recruitment Files	ATR.	6 months		
	Job Description.	6 months		
	Application forms and supporting documents (successful applicant details as per 1 above).	6 months from interview date		
	Shortlisting summary sheet.	6 months		
	Interview Summary sheet.	6 months		
	Equality and Diversity Monitoring.	6 months		
Staffing Committee Documentation	Working papers.	Current session +7 years.		
	Committee papers.	Current session +7 years.		
	Committee minutes	Current session +7 years.		
Policies and Procedures	Impact Assessment papers.	Current version + previous version.		
	Policies & Procedures	Current version + previous version.		

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Department and Responsible Officer	Description of Records	Retention Period	FOI ✓	Notes
Principal's Office Responsible Officer: Principal				
Planning	Strategic Plans.	Current + 5 years		
	Operational Plans.	Current + 5 years		
SFC	Correspondence.	Current + 5 years		
	Funding.	Current + 5 years		
	Returns.	Current + 5 years		
UHI	Correspondence	Current + 5 years		
HMIE	Review Documentation.	Current + 5 years		
Contracts	SNIPEF/CITB, SECTT, etc.	Current + 5 years – last milestone claimed plus 5 years		
Committees	Committee agendas, papers & minutes	Current year + 5 years		
Health and Safety	Business Continuity Plan	Current version		

Appendix 3

Department and Responsible Officer	Description of Records	Retention Period	FOI ✓	Notes
Quality Responsible Officer: Quality Officer				
Awarding Body Approval	Correspondence Course Approvals External/Validation Reports Internal Scrutiny Approvals	Current year + 5 years		
Assessment & Verification	<p>SQA – Unit Evidence</p> <ul style="list-style-type: none"> • HN Units • PDA Units • HN Graded Units • SVQs • Skills for Work • National Certificates (NCs) • NPAs • Awards (Customer Service, Wider Achievement) <p>NQ Units (National 1 – Advanced Higher) National 5, New Higher + Advanced Higher Exams</p> <p>SQA Records of Evidence</p> <ul style="list-style-type: none"> • Assessment Decisions (ACS 1 + CAMs) <p>BCS Centres are required to keep fully auditable records of all assessments for three years after qualification completion</p> <p>C&G</p> <ul style="list-style-type: none"> • Enrolment Records • Learner Database (manual or electronic) • Learner Assessment Information 	<p>Current Academic Year + 1 Month (31st August)</p> <p>1st October of the Current Academic Year</p> <p>Current + 1 year</p> <p>Current + 3 years</p> <p>Current + 3 years</p>		<p>All Unit Evidence, Assessment + Verification, Estimates must be retained if a Post Results Service has been requested</p>

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	<ul style="list-style-type: none"> Portfolios <p>Lantra</p> <p>MCA</p> <p>RYA</p>	<p>Current + 1 Year</p> <p>Current + 5 years</p> <p>Current + 5 years</p>		
Examinations	<ul style="list-style-type: none"> Entry Forms Sit At Forms Alternative Venue Forms Estimates Withdrawal Forms Internal Assessment Mark Form Results 	<p>Current Academic Year + 1 Month (31st August)</p> <p>Post Results Service Request - all documents must be retained until 1st October of the Current Academic Year</p>		
Alternative Assessment Arrangements	<ul style="list-style-type: none"> AAR Form Quality Monitoring Spreadsheet ICT Requests 	<p>1st October of the Current Academic Year</p>		
Quality Assurance Documents	<ul style="list-style-type: none"> Course Committee Minutes Standardisation Minutes Peer Observation Reports Self-Evaluation Reports Internal Audit Reports Course Monitoring Minutes Progression Board Minutes/Action Plans 	<p>Current + 3 years</p>		
Malpractice	<ul style="list-style-type: none"> a report containing a statement of the facts, a detailed account of the circumstances of alleged malpractice and details of any investigations carried out by the centre into the suspected case of students or centre malpractice. written statements from the centre staff and students involved. any work of the student and internal assessment or verification records relevant to the investigation. 	<p>Current + 3 years</p>		<p>Malpractice Policy</p>

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	<ul style="list-style-type: none"> details of any remedial action you are taking to ensure the integrity of certification now and in the future <p>In an investigation involving criminal prosecution or civil claim, records and documentation should be retained for five years after the case any appeal has been heard</p>	Current + 5 years		
Appeals	Records, including all materials and evidence, until the appeal has been resolved. Thereafter, assessment and internal verification records.	Current + 5 years		Appeals Policy & Procedure
Complaints	Records, including all materials and evidence, until the appeal has been resolved	Current + 5 years		Complaints Handling Policy & Procedure

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Department and Responsible Officer	Description of Records	Retention Period	FOI ✓	Notes
Student Services Responsible Officer: Student Services Manager				
Student Guidance/Finance	BACS Printouts to prove processing of Beneficiary payment (if applicable).	Current + 6 years		
	Beneficiary Application forms (including Travel and Childcare Declaration forms, copies of Bursary and SAAS awards letters).	Current + 6 years		
	Correspondence to beneficiaries.	Current + 6 years		
	Counselling notes	Current + 5 years		
	Fee Waiver Forms including details of evidence	Current + 6 years		
	Student Funding Application Forms FE.	Current + 6 years		
	Student Funding Application Forms HE.	Current + 6 years		
	ILA Funded Course Records	Current + 7 years		
	Immigration notes	Current + 6 years		
	International student files	Current + 6 years		
	Personal learning support plans including reports from medical, psychologist, school, DSA/SAAS funding reports	Current + 1 year		
	Student Interview Sheet.	Current + 3 years		
	Student payments direct debits.	Current + 6 years		
Child Protection correspondence	Current + 5 years		Statutory Requirement	

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Learner Administration	Change of Address/Personal Details Forms	Current + 2 years		
	Course Application Forms	Current academic year		
	Course Frameworks	Current + 2 years		
	Course information sheets	Current + 2 years		
	Enrolment Forms	Current + 5 years		
	FES returns	Current + 5 years		
	Group Award Entry Forms	Current + 2 years		
	Result Sheets	Current + 2 years		
	Attendance Registers	Current + 5 years		
	Withdrawal/Transfer Forms	Current + 2 years		
Electronic Reports	Attendance Reports	Current + 3 years		
	Activity Reports	Current + 3 years		
	Performance Indicator Reports	Current + 3 years		
	Enrolment Reports	Current + 3 years		
	Application Reports	Current + 3 years		
	Equal Opportunity Reports	Current + 3 years		
	Miscellaneous/adhoc reports	Current + 3 years		
	Attendance Reports	Current + 3 years		
Paper Documents	Back up documents for SUMS return	Current + 3 years		
	Working documents for performance indicators	Current + 3 years		
	Working documents for UHI, SQA etc.	Current + 3 years		

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