

Record Retention Policy

1. Introduction

1.1. This policy addresses the appropriate procedures for the retention and disposal of $D\bar{o}$ University information, ensuring that we do so consistently and documenting any actions taken. Unless otherwise specified, the retention and disposal policy applies to both physical and electronic records.

1.2. From now on, references to Do University will be simplified to

"Cluster".

1.3. The scope of application includes all people, information, technologies, resources, and facilities that deal with electronic and physical records for which the Group is responsible.

1.4. There are specific rules that apply to document retention in relation to the ESF. Funded and counterpart-funded qualifications; documents must be retained for 10 years after the end of funding.

2. Record review

2.1. Review is the examination of records at the end of their retention period to determine whether they should be permanently destroyed or retained for a longer period.

3. Record Retention

3.1. Records should be retained only as long as necessary to fulfill our operational functions and business needs, and to comply with legal and regulatory requirements. We evaluate our records to determine:

- its value to the Group
- Its importance as evidence of activities and decisions

• any regulatory retention requirements, such as the current ones: Data Protection, Freedom of Information, Environmental Information and Restrictions



legislation and regulations.

• be relevant or provide evidentiary value for

any claim, litigation, arbitration or investigation.

3.2. Departments are responsible for managing the records under their care,

ensuring that only relevant records are archived.

and that all boxes containing archival materials are correctly annotated

using the archival label template

to allow individual records within the boxes to be

can be retrieved upon request (Appendix 1).

- 3.3. Where possible, the Group prefers that records be retained in a machinereadable electronic format.
- 3.4. When the Group keeps paper records, consideration should be given to

suitable storage location that recognizes the sensitivity of the records, the

frequency of access required and the retention period

retention.

4. Archive facilities

4.1. Records to which regular access is required must be

be kept locally in the department. They will be kept in a safe place that does not represent a fire risk or a health and safety hazard.

- 4.2. When documents do not require regular access but must be retained, they must be archived.
- 4.3. The Group prefers paper records with data classification public or private, intended for long-term storage, conserved in situ.



The archive facilities in

situ are maintained in:

Headquarters of $D\bar{o}$ University registered office at C/27 OLD GLOUCESTER STREET, (WC1N 3AX) LONDON UK

4.4. For paper records with a classification level higher than

private, or when on-site archiving facilities are at capacity

of your capacity, it is preferable to digitize them or store them with the

external archive provider authorized by the Group. The team

Information Governance can facilitate this task.

4.5. The group's archive facilities are managed by the Information Governance team and the Group Archive Manager.

5. Disposal

5.1. Logs are divided into two main categories for disposal:

• Destroy after an agreed period: when the useful life of a series or collection of

Records can be easily predetermined (e.g. destroy after 3 years; destroy 2 years).

years after the end of the fiscal year).

- Review see 2 above.
- 5.2. Records will be destroyed as follows:

• Non-confidential paper information can be disposed of using recycling containers where

appropriate

• Confidential information must be disposed of using a

cross-cut shredder, pulped, burned or

destroyed through the Group's contractor.



5.3. Confidential information in electronic format must be destroyed in such a way that it cannot be recovered. Advice should be sought from IT Services.

5.4. The destruction of confidential information in paper format must be carried out in accordance with DIN 66399 with a minimum security level of P4 - maximum cross-sectional particle area 160mm^2 with a maximum strip width of 6 mm = 6x25 mm.

5.5. The disposal of records listed in the Disposal Plan does not need to be documented. Records disposed of outside the Plan, for example, due to waste being disposed of earlier or retained for a longer period, should be recorded for audit purposes.

6. Exchange

6.1. Copies of records should be destroyed when they are no longer needed for the purpose for which they were created. When information has been regularly shared between departments, only the original records should be retained.

6.2. When the Group shares information with other organizations, we must ensure that they have appropriate procedures in place to ensure the information is managed in accordance with our policies, as well as applicable laws and regulations.

Requirements. This should be detailed in a data sharing agreement.

6.3. Where appropriate, a data privacy impact assessment shall be conducted.

7. Guidelines for archiving

7.1. The following schedule establishes the periods during which the

must retain documents relating to key areas of business and to meet operational needs. In some cases, the retention periods will be determined according to the legal requirements, while others will reflect the requirements of the School.



7.2. The retention period refers to the period after the current year and applies to both

Docum	ient	Maintained by	Retention period	Responsible Department
1	Governance			
1.01	Agenda, documents and minutes of the Council and its Committees	Secretary of the Boardof Directors	College Life	Executive Office
1.02	Appointments of members of the Governing Body	Secretary of the Boardof Directors	T termination of quote + 6 years	Executive Office
1.03	Register of Interests	Secretary of the Boardof Directors	Termination of quote + 6 years	Executive Office
1.04	Terms of reference	Secretary of the Boardof Directors	Life of the Committee	Executive Office
1.05	Training of governors	Secretary of the Boardof Directors	Termination of quote + 6 years	Executive Office
1.06	Annual Assembly of Proxies and Voting Cards	Secretary of the Boardof Directors	Without survey – 3 months Survey – 1 year	Executive Office
1.07	Strategic plans: key records	Secretary of the Boardof Directors	Current + 10 years	Executive Office
1.08	Establishment of the structure of governance and the terms of	Secretary of the governing body	College Life	Executive Office
1.09	Constitution and Closure of Committees and Societies	Secretary of the Boardof Directors	College Life	Executive Office

electronic and paper documents:



Document		Maintained by	Retention period	Responsible Department
2	Executive Office			
2.01	Contracts, Agreements and Licenses	Director of operations	7 years	Executive Office
2.02	Agenda, documents and minutes of the working groups	Major	3 years	Executive Office
2.03	Establishment of the legal framework	Secretary of the Board of Directors	University life	Executive Office
3	Farms and Facilities			
3.01	Property Inspection	Director of Real Estate	Completion + 6 years	Farms and Facilities
3.02	Maintenance and repair of the	Director of Real Estate	Completion + 15 years	Farms and Facilities
3.03	Construction plans	Director of Real Estate	Life of buildings	Farms and Facilities
3.04	Transport: includes travel book driver's record,	Director of Real Estate	3 years after the vehicle disposal	Farms and Facilities
Financ	e			
4	Finance			
4.04	Financial records: includes invoices, receipts, accounting books, accounts, statements, extracts,	CFO	Audit +7 years	Office of Finance
4.05	Accounts required by Section 221 of the Companies Act	CFO	6 years from from the date of	Office of Finance
4.06	Capital (invoices)	CFO	Audit +10 years	Office of
4.07	Internal and external audit reports	CFO	Audit +7 years	Office of
4.08	Tenders	CFO	7 years	Office of Finance
4.09	Insurance Inc. Schedules, Claims and Settlements	CFO	Current + 7 years	Executive Office
5	Quality	· ·		
5.01	Quality Assurance Manual	Deputy Director of Quality	Life of the organization	Quality Office
5.02	Reports from professional bodies and	Deputy Director of Quality	Life of the organization	Quality Office
5.03	External inspections	Deputy Director of Quality	Life of the organization	Quality Office
5.04	Staff professional development records	Head of Professionals Development	5 years	Teacher Dev.
5.05	eSAR and ARAQ	Deputy Director of Quality	Current + 5 years	Quality Office



Docu	ment	Maintained by	Period of	Responsible Department
5.06	Surveys	Deputy Director of Quality	Current + 5 years	Quality Office
5.07	Complaints	Deputy Director of Quality	Current + 3 years	Quality Office
6	Health and safety		•	
6.01	Accident Log/Reports, including reports	Health and Safety Manager	7 years	Farms and Facilities
6.02	Inspections/Evaluations/Records including	Health and Safety Manager	7 years	Facilities
6.03	Fire certificates	Health and Safety Manager	Until it is	Farms and Facilities
6.04	Risk assessments	Health and Safety Manager	Until it is	Facilities
6.05	Health Records Inc. Asbestos, Compressed Air, COSHH	Health and Safety Manager	40 years from	Farms and Facilities
6.06	Safety statements, including construction,	Health and Safety Manager	Life of the subject	Farms and Facilities
7	Human resources		- ·	
7.01	Payroll data: payment requests,	CFO	Audit +6 years	Office of payrolls
7.02	Recruitment files	Director of Resources Humans	6 months since date of the decision	Human resources
7.03	Personnel files, including contracts, appraisals, records of development, health records,	Director of Resources Humans	Duration of employment + 6 years	Human resources
7.04	Policies of investment/plans	CFO	12 years later the benefit	Payroll of salaries
7.05	Pension Records Inc. Payments, Adjustments, and Reports	CFO	12 years of after the benefit	Payroll of salaries
7.06	Redundancy	Director of Resources	<20 – 3 years > 20 – 12 years	Human resources
7.07	Union agreements	Director of Resources Humans	Duration of agreement + 10	Human resources
7.08	Reporting irregularities	Director of Resources Humans	Duration of the time	Human resources
8	Legal			
8.01	Property deeds	Director of operations	Indefinitely nte or	Executive Office



Docu	ment	Maintained by	Period of	Responsible Department
8.02	Company registrations, including	Secretary of the Council of	Life of the	Executive Office
			Organization Life of the	
8.03	Policy documents	Director of operations	Organization	Executive Office
	Constitution or Bylaws, including		Life of the	
8.04	name change	Director of operations	Organization	Executive Office
8.05	Stamp Registry	Secretary of the Council of	Life of the	Executive
			Organization	Office
8.06	Contracts, agreements, leases and others	Director of operations	12 years	Executive Office
			after the 12 years	
8.07	Patents	Director of operations	12 years	Executive Office
8.08	Trademarks and service marks	Director of operations	10 years after	Executive Office
8.09	Data Protection and Freedom of Information Registry	Director of operations	Current + 7 years	Executive Office
9	Student records			
9.01	Course/subject details	Section leader	Course life	
0.02			+ 5 years	Office of
9.02	Course/subject materials	Section leader	1 year	Office of
	Student details (including			
9.03	personal data) personal, records of	Student tutors	Current + 6 years	Office of administration
	Student Services:	Additional support	Current + 6 years	
	- Advice - Advice and guidance	Additional support	Current $+ 6$ years	
9.04	- EMA	Experience of the	Current $+ 6$ years	
	- Student Fund - Support for childcare	student Student	Current + 5 years Current + 5 years	Offices administrative
	- Transport	Student with experience	Current + 5 years Current + 6 years	administrative
9.05	Student applications, including those		Current + 1 year	Admissions
	rejected applications	Admissions Team Leader		
9.06	Higher education courses	Section leaders	1 year since termination	Curricular areas
9.07	Evaluated work of students of	Section leaders	5 years since end of the course	Curricular areas
9.08	Accommodation	Accommodation	Current + 7 years	Accommodation
9.09	Safeguard	Deputy Director	Until the data The subject arrives at the	Office executive
9.10	Behavioral references	Student tutors	Current + 6 years	Office of
	managerial, including expulsion			
9.11	Work experience, including		Current + 5 years	
1	agreement forms,	Workshop	Current + 5 years	Office of



Docu	ment	Maintained by	Period of	Responsible Department
9.12	Off-site visits	Section leaders	Current + 5 years	Curricular areas
9.13	Schedules	Schedule and Records Coordinator	Current + 5 years	Information &
9.14	Records	Schedule and Records Coordinator	Current + 5 years	Information &
9.15	Exams (includes registration, results, certificates, schedules,	Exam Coordinator	Current + 5 years	Exam nes
9.16	Higher education transcripts	Higher education	120 years from	Education superior
9.17	References from employers or other establishments	Information and financing	Last action + 1 year	Information &
9.18	Registrations	Information and financing	Current + 5 years	Information &
9.19	Records of achievements	Information and financing	Current + 5 years	Information and financing
9.20	Exercises of benchmarking and	Information and financing	Current + 1 year	Information &
9.21	International students	International Director	Current + 5 years	International
9.22	Qualifications funded by the	Information and financing	At least until the 31st	Information &
9.23	Open University	Higher education	120 years from	Higher education
10				
10.01	Software licenses	IT Director	Current + 1 year	
10.02	Inventories	IT Director	Only current	IT Services
10.03	Email accounts	IT Director	Closed within the 7 days of departure Removed after	IT Services
10.04	Email inbox	IT Director	Post-effective IT merger system s 2 years from	IT Services
10.05	Email box sent	IT Director	Post-effective IT merger system s 2 years from	IT Services
10.06	spam folder	IT Director	30 days from the date mail	IT Services



Document		Maintained by	Period of	Responsible
				Department
10.07		IT Director	90 days from the date	IT Services
	Email Deleted Items Folder		mail	11 Services
10.08	Retaining backup tapes	IT Director	18 months	IT Services
10.09	Barracuda Cloud Retention	IT Director	18 months	IT Services
10.10	CCTV recordings	IT Director	Creation + 1 month	IT Services
10.11	Record keeping in relation to operation	IT Director	30 days	IT Services
10.12	Disposal of WEEE IT assets	IT Director	4 years	IT Services
11	General Administration			- -
1.01			Current + 1 year	
1.02			Current + 1 year	
11.03	Purchase orders		Current + 1 year	-
11.04		Director of Sales and	Current + 7 years	Sales and
11.04	Customer relationship management	Marketing		Marketing
11.05	Conference proceedings		Current + 1 year	
12	Childcare/Nursery Services			
12.01	Childcare Files Inc. Records, Histories	Senior Care Manager	Current + 21 years old	Nursery
12.02	Complaints	Daycare Manager	Current + 3 years	Nursery
12.03	Configuration journal and daybooks	Daycare Manager	Current + 21 years old	Nursery
13	Marketing			
13.01	Marketing surveys	Head of Marketing	Current + 5 years	Marketing
13.02	Press stories + newsletters	Head of Marketing	Life of the	Marketing

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Approved by:

Group Leadership Team

Date of

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revision:

Key contact information:

Diana Stirbu, Data Protection Officer admin@vae-universityuk.uk

Josep Fabra, IT Director



Engrave

Appendix