Guidance for managers on the retention of staff records

Purpose
This document provides guidance for managers on the retention of any records they hold which concern members of staff, for example records of annual leave, and records held which concern other individuals such as job applicants.

These guidelines are concerned with ensuring that we do not keep personal and/or sensitive data about individuals for longer than is necessary, in accordance with data protection legislation. To make it easier to manage the disposal of records, two standard retention periods have been agreed, i.e. 6 years and 1 year. This guidance supports the University’s Record Retention Schedule.

Personal data is defined as data which relates to a living individual who can be identified from that data. Sensitive personal data concerns the subject’s race, ethnicity, politics, religion, trade union status, health, sex life or criminal record.

Principles
i. Included in the core principles of the Data Protection Act is a requirement that personal information is accurate, kept safe and secure and for no longer than is absolutely necessary.

ii. The University retention schedule requires any documentation pertaining to the employee’s contract of employment to be held for the lifetime of the employment plus six years or longer in some instances. This information is held in HR Services in a personnel file identified with the individual’s name.

iii. HR Services are also the custodians of any sensitive personal data, which is collected for workforce monitoring purposes only and serves to measure the impact of our equality and diversity policies. Local managers should not keep any such data although they may wish to keep reports supplied by HR Services which show summary data provided in the spirit of promoting those policies.

iv. The Occupational Health Service, Disability Support Office and Counselling Service keep records of all health referrals and may do so for longer periods than for contractual documentation.

v. Safety Services keep records of all accident reports forms and accident investigations.

vi. Staff Training and Development Unit (STDU) keep records of any training undertaken through the University’s training catalogue or where sponsorship has been secured through the University.

vii. Other documents need only be held from the date of the last action plus six years. This will apply to the type of document typically held by the line manager as listed below.

viii. If a manager is in doubt about whether certain records require retention for longer than six years they should seek advice from HR Services.

ix. Information regarding unsuccessful job applicants must only be kept for a period of one year following the decision to appoint, unless they applied as part of a recruitment exercise that resulted in the University sponsoring an employee’s visa application. In this specific instance, records should be returned to HR Services who will retain the documents for the required period.
Record Keeping
For simplicity of disposal, rather than storing the documents in individual files it is recommended that, as far as is possible, documents are stored in libraries, in date order, relevant to their topics. This should enable ease of pruning the data once the retention period has elapsed and will mean that information relating to leavers will also automatically filter out of the record system.

All libraries of paper and electronic records (including emails), should have restricted access so that they can only be visited by the line manager responsible and/or an appropriately designated person. Paper records must be kept in a secure, locked cabinet. Electronic records should only be stored on secure University network drives and must not be stored on portable media unless appropriately encrypted.

At the end of the specified retention period, records must be disposed of in accordance with the Guidance for Disposal of Confidential Records. Paper records must be shredded using a local shredding machine or using the services of Shred-it, the University's approved supplier for such services.

Where staff transfer internally to a new area, the only records that should be transferred to the new line manager are those relating to Absence and Attendance (see below). All other records should be retained by the original manager for the period stated below.

The following table sets out the employee records which should be held locally. All other records will be held by HR Services, or the departments stated overleaf. Managers may wish to keep these documents in the following libraries structure:

<table>
<thead>
<tr>
<th>Library</th>
<th>Contents (examples)</th>
<th>Retention period</th>
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| Staff Development        | • Staff training and development undertaken  
                          | • Details of courses and conferences attended                                     | Current plus 6 years |
| Performance Assessment   | • Induction checklist  
                          | • Probation reviews  
                          | • Teaching evaluations  
                          | • PDR record  
                          | • Rewarding exceptional performance or thank you scheme correspondence  
                          | • Promotion/re-grading details                                                 | Current plus 6 years  
                          | (e.g. a record created in March 2015 will be retained until 31 July 2021)       |
| References               | • References written about individuals (e.g. to support promotion cases)         | Current plus 1 year |
| Absence and Attendance   | • Annual leave records  
                          | • Communication relating to maternity/paternity/special leave/flexible working/academic leave, etc  
                          | • Return to work meetings following sickness, maternity, etc  
                          | • Occupational health reports  
                          | • Self certs and Fit Notes                                                     | Current plus 6 years |
| Discipline and Grievance | • Letters, reports and meeting notes relating to cases                            | Current plus 6 years then passed to HR Services for review |
| Workforce Planning       | • Fixed Term Contract consultation meeting notes and documentation  
                          | • Contract extension details                                                    | Current plus 6 years |
| Recruitment and Selection | Candidate assessment /shortlisting notes | Interview notes | Unsuccessful applications | Speculative CV’s | 1 year from date of appointment, unless the University sponsored a worker as a result of the exercise (see principle ix) |