**Guidance on using the Records Retention Schedule**

**Introduction**

The Records Retention Schedule (“Retention Schedule”) describes the time periods for which records should be retained by the University in order to comply with operational and legal requirements, including Data Protection legislation.

The Retention Schedule is an important part of the University’s Records Management Policy and wider information governance framework. The University has an obligation under Data Protection legislation to destroy personal data about individuals once there is no primary business purpose or legal reason to retain it (staff, students and research subjects for example), and should not hold out of date, unnecessary or excessive information about any individual. Information held by the University is subject to the Freedom of Information Act 2000 and may be liable to public disclosure. Holding excessive data slows down University systems, takes up physical space, wastes valuable staff time and leads to unnecessary storage and administration costs.

A record is defined in the Records Management British Standard BS ISO 15489 as “Information created, received and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business”. All records created and held by the University, both in paper and electronic form, and including data held in databases are subject to retention policies.

**Records retention and destruction**

Please note that the default action to be taken at the end of the retention period is the secure destruction or deletion of the record. Exceptions to this are where the retention period is described as “permanent” (ie the record will never be destroyed), or where “refer to archives” is mandated. In the latter instance the record should be offered to the University Archive Service for permanent retention before it is destroyed. It may also sometimes be necessary to keep documents beyond their retention periods on an ad hoc basis, for example if they are needed due to a legal claim or disciplinary process.

Only one copy of each record (the master copy) needs to be kept for the full length of the retention period. Duplicate and secondary copies should be destroyed as soon as they are no longer of immediate operational use. No duplicate record should be kept for longer than the appropriate retention period. The master copy of a record is sometimes hard to define, but would often be the copy which originates with the author, or which is kept by the owner of the process of which it is a part. University projects, groups, boards and committees should determine who maintains the master record.

The retention periods defined in this schedule are mandatory. Where it is technically or administratively impossible for local records to be deleted or destroyed the Information Governance Office should be informed so that an exception process and risk assessment can be undertaken. This is particularly important for records which contain personal data about individuals, as the Retention Schedule forms part of the Information Governance framework, and we have a legal obligation to destroy personal data when it has reached the end of its lifecycle. Records which are likely to contain personal data are marked with an asterisk on the schedule.

**Appropriate filing and storage**

All records should be kept in appropriate and secure storage during their active lifecycle.

Ideally email should not be used for storing important University records. Emails that constitute a record which needs to be retained, including those containing personal data, should be stored in an appropriate filing system relevant to their confidentiality or criticality. In any case, any data held within email systems must be managed in accordance with the Retention Schedule.

Shared drives or other unstructured information storage solutions (including SharePoint and cloud based storage) used to store any University record should be managed in accordance with the schedule, and records should be filed under an appropriate folder structure within those systems. Filing systems should be structured so that they facilitate the application of the Retention Schedule. An example of this would be the filing of record types by year to facilitate annual destruction cycles.

**Structured systems storing personal data**

All structured information management systems (eg IT Applications such as HR and student systems) that store records containing personal data must be managed in accordance with the Retention Schedule. These systems must have a deletion capability and where appropriate be able to identify a skeleton record (a subset of the original information) for continued retention.

**General principles**

This Retention Schedule is not exhaustive, and local areas will often find that some elements of their business will not be covered. It is appropriate that in this instance local retention schedules should be produced. These schedules should not contain retention periods which contradict policies in the main schedule as consistency across the institution is important, particularly for personal data. Local retention schedules should only include data not covered by the University Retention Schedule such as records only produced by that area as part of its specific business, and should be approved by the Information Governance Office.

Help with producing local retention schedules is available from the Information Governance Office.

In order to aid the production of local schedules the following general principles should be noted.

* University policy and strategy documents should be retained for 10 years or 5 years, depending on importance, and then referred to the University Archives for review.
* Audits and reviews of performance against plans and strategies should be retained for 10 years or 5 years, depending on importance after the current academic year and then referred to the University Archives for review.
* Contractual documents and customer service agreements should be retained for 6 years after the termination of the contract or agreement, and then referred to the University Archives for review.
* Financial records should generally be kept for 6 years after the current financial year to comply with the Limitation Act 1980 and HM Customs & Excise Notice 700/21: Keeping [VAT] records and accounts.
* Contracts under seal and their related negotiation, establishment and review documents should be kept for 12 years after the termination of the contract and then referred to the University Archives for review.
* Publications and promotional materials should be kept whilst current, and then 1 copy offered to the University Archives for review.

Please contact the Information Governance Office if you have any queries relating to the Records Retention Schedule.