

Records Retention Guidance

What is a Records Retention Schedule?

A records retention schedule is a control document. It identifies and describes an organisation's records that have been created in the course of its business and it provides guidance and instructions for the retention and disposal of records in order to meet business needs and to fulfil legal and regulatory requirements.

The retention schedule applies to all records in any format, e.g. paper, electronic (including CDs, external drives), databases, microfilm/microfiche, CCTV. All institutional records come within the scope of the retention schedule including emails, personal files and research records.

Why is a Records Retention Schedule needed?

Records should have retention periods so that they are managed efficiently and only destroyed legitimately. The aims of having an institutional records retention schedule are to:

- provide consistent recommendations for the retention of records as this promotes control over the university's records
- prevent records from being discarded prematurely and ensure that information is not kept unnecessarily in order to ensure the university's compliance with legal and regulatory requirements
- help save space both physical and electronic and money by reducing storage and maintenance costs
- ensure that records of long-term research value are transferred to the University Archive where they will be indefinitely preserved and made available to researchers who are interested in the history of Queen's, Belfast

How long should records be retained?

Various factors dictate the retention periods for different categories of records and these include:

Operational/Business needs

Staff should decide how long the records they create are needed for business purposes.

Legal & Regulatory requirements

There are legal requirements for the retention of records for certain periods of time. Examples of such legislation include the Limitation Act 1980; the Value Added Tax Act 1994; UKVI (UK Visa and Immigration Service) statutory requirements for the retention of visa/immigration related records in respect of international students and staff; and Health and Safety regulations.

Under the Data Protection Act 1998 it is a legal requirement that personal data should only be kept for as long as it is needed for the purpose it was collected (Principle 5 of the DPA) and in order to meet the accountability principle of the GDPR (General Data Protection Regulation), 2018, institutions have to set retention periods for personal data.

Under the Freedom of Information Act, 2000, it is a criminal offence for a public body to destroy any documents to prevent disclosure of information so it is crucial that there are coherent, clearly defined procedures for discarding records so it can be shown that they were destroyed legitimately and not to prevent disclosure.

Professional regulatory bodies such as the General Medical Council, the General Dental Council, and the Northern Ireland Social Care Council have requirements that certain records need to be retained by universities for a certain time.

And Research Funders, including both UK and EU bodies, mandate retention periods on project records and research data.

Audit requirements

Certain records are required for audit purposes such as a financial audit or an UKVI audit.

Personal Data

It should be known if the records contain personal data and if the purpose for which the records were created has been met.

Relationship with other records

It should be ascertained what records are needed to understand or use other records. If so then the retention periods of all the related records should tally.

HE best practice/recommendations

It is useful to know what the record retention policies and practices are in other UK universities and what the JISC generic retention schedule recommends.

Long-term research value

If the records have long-term research value then they should be transferred to the University Archive.

Queen's Records Retention Schedule

The Queen's Records Retention Schedule is arranged according to the functions of the university such as HR management, Finance management, and Student Administration rather than being based on the organisation of the university because this organisation changes and there are functions which are the same/similar across the organisational units e.g. all Schools deal with student assessment files and all units hold staff and finance records.

The Retention Schedule is structured as follows:

Reference

This is a running number which makes for ease of reference for the different sections within individual schedules

Descriptions of Records

A brief description of the record series e.g. examinations scripts, appraisal forms, purchase orders.

Retention Trigger and Retention Period

The Retention Trigger is the event which triggers the retention period to begin e.g. graduation/withdrawal of student; termination of employment; end of the financial year. The Retention Period for each category of records e.g. 6 years; 40 years; 75 years.

Disposal Action

The instruction on what to do with the records when the retention period expires:

- destroy by confidential shredding
- delete from an electronic system
- review at the end of the retention period to decide on the disposal action
- permanently retain and send to the University Archive

Rationale for the Retention Period and Disposal Action

The reason for the retention period e.g. a legislative requirement such as the Value Added Tax Act 1994; or a business need.

Records Owner

Where the records are located e.g. the central staff file is held in HR; appraisal forms are held in local offices.

Implementation of the Queen's Records Retention Schedule

Responsibility for the implementation of the Retention Schedule is assigned to appropriate members of staff such as School Managers, or Administrators who deal with the management of records in their offices.

Further advice

The University Records Retention Schedule is available on the webpages of the Information Compliance Unit and all queries relating to the Retention Schedule should be directed to the Information Compliance Unit,
<http://www.qub.ac.uk/about/Leadership-and-structure/Registrars-Office/Information-Compliance-Unit/>