

# DE MONTFORT UNIVERSITY RECORDS MANAGEMENT

## RECORDS RETENTION POLICY

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## De Montfort University Records Management Records Retention Policy

### Introduction

Records contain information that is a unique and invaluable resource and important operational asset. A systematic approach to the management of the University's records is essential to protect and preserve records as evidence of our actions.

Determining retention periods for records is ultimately a matter of risk management. Institutions must make their own assessment of the risks associated with the retention and disposal of their records.

Records which are retained may need to be disclosed in response to a request for information under the Freedom of Information Act 2000.

There are many cases where it is reasonable to keep data that is out of date. For example where series of correspondence has been undertaken during the negotiation of a contract, some of this will have been overtaken by events, but it is reasonable to keep a record. This would also apply to records of a student's achievement at any particular time.

It may be reasonable to keep certain data on a subject for longer than some other data. For example, it may be that the detail required supporting information requirements on a student will diminish with time although a basic record may be required for some purposes for a much greater period. Historical data should be kept separately from current data stored in an archive and records kept of what data is stored and when and how moved.

### *Records retention schedule*

A Records Retention Schedule is a control document that sets out the periods for which an organisation's business records should be retained to meet its operational needs and to comply with legal and other requirements. A Records Retention Schedule is an essential component of an efficient and effective records management system. Properly developed and consistently implemented, it protects the interests of the organisation and its stakeholders by ensuring that business records are kept for as long as they are needed to meet operational needs and to comply with legal requirements, and are then disposed of securely.

The JISC Higher Education Records Retention Schedule provides generic guidance on retention of records which are commonly generated by higher education institutions (HEIs) in the course of their core academic work, developing their relationships with their stakeholders and managing the institutions themselves as corporate bodies.

The JISC records retention schedule is not totally exhaustive but provides best practice for the key type of records identified in the schedule. It should be read in conjunction with the University's Data Protection Policy and guidance on personal/confidential information retention as well as the University's Guidance for using the JISC Record Retention Schedule. (Attachment A)

## **Records Retention**

### **1. Scope of the policy:**

- 1.1 This policy applies to all records created, received or maintained by staff of the institution in the course of carrying out their corporate functions. Records and documentation created in the course of research, whether internally or externally-funded, are also subject to contractual record-keeping requirements.
- 1.2 Records are defined as all those documents which facilitate the business carried out by the University and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.
- 1.3 All records covered by the Data Protection Act 1998 fall within the scope of this policy, although the Act is not prescriptive about methods of retention. The DPA covers personal information held as computer records, manual files (e.g. index cards, filing systems, etc.) discs, CD's, emails and video tapes, paper records and minutes of meetings.
- 1.4 Data must be retained for as long as is required by law, financial and audit requirements. Records no longer being added to regularly but are being retained for a set purpose may still need to be kept up to date. "Where necessary" is the wording in the Data Protection Act 1998

### **2. Objectives of a records retention policy**

- 2.1 To ensure that the records being retained at the University meet the standards and compliance of the University's Records Management Policy.
- 2.2 To ensure that the University meets legal, financial and audit requirements in respect of its record-keeping.
- 2.3 To establish an institutional schedule for the maintenance and retention of the University's records by adapting and using the Joint Information Systems Committee (JISC) record retention schedule guidelines based on the JISC publication, "Study of the Records Lifecycle" to underpin DMU records' retention policy and practice.

### **3. The Records Retention policy of the University is:**

- i To uniformly adopt and implement the JISC business classification and records scheme in all Faculties and Directorates.
- ii To ensure that any decisions to retain records containing personal information on individuals take account of the provisions of the Data Protection Act 1998, including the possible need for disclosure in response to a request for data subject access under that Act.

- iii To ensure that all decisions to retain or destroy records are formally authorised by appropriate senior officers (data owners) who can commit the institution to the potential consequences of those decisions.
- iv To implement procedures for the regular checking of review dates and accuracy and relevance of data.
- v To select, as appropriate, records of the University for permanent preservation as part of the institution's archives, for historical research and as an enduring record of the conduct of business.
- vi To comply not only with information-related legislation but also with any other legislation or regulations (including audit, equal opportunities and research ethics) affecting the institution.
- vii To ensure that all updates added to the JISC schedule after the date of the approval of this policy are evaluated and, if appropriate, added to the University's records retention schedule.

#### **4. Responsibilities**

- 4.1 The University has corporate responsibility to maintain its records and record-keeping systems in accordance with the regulatory environment. The Senior Management Team member with overall responsibility for this policy is the **Pro-Vice Chancellor**.
- 4.2 The University's Record Manager is responsible for drawing up guidance for good records retention practice and promoting compliance with this policy in such a way as to ensure the easy, appropriate and timely disposition of information.
- 4.3 Heads of department and units have overall responsibility for the management of records generated by their departments' activities, namely to ensure that the records created, received and controlled within the purview of their department or unit, and the systems (electronic or otherwise) and procedures they adopt, are managed in a way which meets the aims of the University's records management policy and records retention policy.
- 4.4 Members of staff with designated responsibilities for processing of information that either alone or when put with other data creates a record are accountable to the head of their department to ensure that electronic systems and functions and transactions performed by them comply with this policy and related requirements.

4.5 Committee Secretaries are responsible for ensuring that a full record of a committee's business (its minutes, agenda and all supporting papers) is preserved and that any documents generated or received electronically are printed in hard copy format and for part of the full and official record. This official record, in paper format and designated for permanent retention in the University Archive, will be taken as the definitive and authentic copy where minutes are not signed. Any copies will be the personal responsibility of individual committee members.

## 5. Relationship with existing policies

This policy has been formulated within the context of the following University Documents:

- Information Strategy
- Freedom of Information Policy
- Data Protection policy
- Records Management Policy

## 6. Guidance

*Guidance on the procedures necessary to comply with this Policy is available from the Records Manager. This guidance covers:*

- *Records creation*
- *Business classification (for filing schemes)*
- *Retention periods for records*
- *Storage OPTIONS FOR RECORDS*
- *Destruction options for records*
- *Archival records: selection and management*
- *Appraisal of records for disposition and destruction*
- *External codes of practice and relevant legislation*
- *Glossary of terms*
- *Transfer and transmission of records*
- *Ownership of records*
- *Electronic records*

## **7. Contacts**

**University Records Manager**

**University Freedom of Information Officer and Data Protection Officer**

**University Data Controller**

Appendix A - Records Management guidelines for the use of the JISC Record Retention Schedule

Appendix B - Records Management guidelines to determine confidential -vs- non-confidential records

Appendix C - Guidelines for which records may routinely be destroyed

Appendix D - JISC Index of Retention Schedule categories

<http://www.jiscinfonet.ac.uk/partnerships/records-retention-he/>

Appendix E - References