

## RECORDS RETENTION AND DISPOSAL POLICY

### 1. Policy Statement

- 1.1 The University is committed to good practice in records management, and in particular is committed to retaining information for as long as necessary and no longer.
- 1.2 The retention periods for different groups of records shall be determined by consideration of the operational, legal and contractual requirements, and in line with best practice within the Higher Education sector. JISC has conducted extensive research and consultation to provide a Business Classification Scheme and Records Retention Schedule<sup>1</sup> tailored to the needs of the sector, and this shall be followed wherever possible. Any deviation from or extension to this guidance shall be discussed with the Data Protection Officer and the reasoning behind the retention period recorded in the Records Retention Schedule.

### 2. Scope

#### 2.1 This Records Retention and Disposal Policy:

Applies to all information for which the University has a legal, contractual or moral responsibility, and which is organised into information sets.

Applies to all information sets regardless of the format of the information, including collections of documents or emails, databases, collections of images, video or sound etc.

Applies to all information sets, regardless of the media on which the information is stored, including electronic, paper, film, CD, DVD, microfiche etc.

Applies to all students, staff, contractors or any other person or organisation having access to



forthcoming legal action, shall not be destroyed until the request or action is complete.

- 5.5 Information sets may be retained longer than the retention period for the relevant record group where there is a clear business purpose, for example to comply with the conditions of a research contract. Such exceptions shall be discussed with the Data Protection Officer.
- 5.6 Heads of Department, School or Centre (for cases of automated and manual processing) shall ensure that the retention periods are appropriately reflected in system processing and/or business processes.
- 5.7 Copies of records sets shall be destroyed as soon as their purpose is fulfilled, and in any case no later than the original is destroyed. This does not apply to data backups made for business continuity or disaster recovery purposes, and which would not normally be available for access.
- 5.8 When the retention period expires, the information shall be destroyed in such a way that the information cannot be retrieved. Particular care shall be taken where the information is categorised as restricted or highly restricted. A log shall be kept summarising the information destroyed, and these logs shall be passed to the Information Custodian for permanent retention.
- 5.9 Where the retention period is specified as 'permanent', the Information Custodian(s) shall liaise with the Head of Department, School or Centre to agree archiving arrangements, and ensure that the Head of Department, School or Centre make arrangements for these to be incorporated in the relevant computer systems and/or business processes.

## **6. Responsibilities**

### **6.1 Data Protection Officer:**

Maintain and publish the Records Retention Schedule and inform appropriate staff of any material changes to it;

Provide advice where there is a perceived need to deviate from the retention periods recommended for record groups in the JISC Records Retention Schedule, or to determine retention periods for information sets that do not correspond with a record group in the JISC Business Classification Scheme;

Provide advice to Information Custodian in cases where there is a business need to retain an information set for longer than the normal period for the record group; and

Notify Information Custodian

Discuss archive arrangements with the Head of Department, School or Centre for any record sets to be retained permanently, and ensure that steps are taken to implement these arrangements;

Ensure that arrangements are made to prevent the destruction of data when informed that they need to be retained because of a request under relevant legislation or because of an impending legal action; and

Permanently retain data destruction logs.

6.4 Heads of Departments / Schools / Centres / Line Managers / Supervisors:

Ensure that the retention periods are appropriately reflected in business processes;

Ensure that logs of data destruction are kept and passed to the Information Custodian; and

Ensure that their staff are aware of the Records Retention

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**TITLE OF POLICY:** Records Retention and Disposal Policy