RECORDS RETENTION SCHEDULE

EQUATE SCOTLAND

V1.0
February 2019

Revision and Signoff Sheet

Change Record

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Document Review Table				
Date	**Action by (initials)**	**Version updated (e.g. V1.3)**	**New version number (e.g. V1.4 or V2.0)**	**Brief description (e.g. updated Records Series 1-3, corrected typos, document updated to reflect team structure change)**
21/02/2017	MR	0.1		Initial draft for review/discussion
02/04/2018	MR	0.1	0.2	Updating following new GDPR legislation
10/01/2019	TY	0.2	0.3	Updating following meeting with D Leigh
28/01/2019	AR	0.3	0.4	Amendments and comments by Aimi Richmond
11/02/2019	MR	0.4	0.5	Updated following meeting with A Richmond and T.Yaqoob and team training session from Diana Watt 11 Feb 2019
12/02/2019	AR	0.5	0.6	Transferred to new template, condensed section 2, comments on 2.3
13/02/2019	MR	0.6	0.7	2.3 completed
13/02/2019	AR	0.7	1.0	Contents updated, draft status removed

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i) Records Retention Schedule – Purpose and Guidance

A Records Retention Schedule is a control document that sets out the periods for which the University's 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, a Records Retention Schedule protects the interests of the University 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 appropriately.

Records Retention Schedules facilitate the University's compliance with legislation, for example, the Data Protection Act 1998 Principle 5 states that personal data "shall not be kept for longer than necessary", and for the purposes of the Freedom of Information (Scotland) Act 2002, managing records in a corporately organised way enables public bodies to respond, as required by FOI(S)A, in a way that a) ensures compliance with legislative requirements, and b) with the minimum amount of effort. Records Retention Schedules promote improved records management practices, ensuring that information is accessible whilst protecting privacy and personal data. They assist with preventing premature disposal of records retained to satisfy legal, business, financial, etc. requirements and ensure that information is disposed of timeously or retained permanently, if required.

Records are the result of the functions, activities and tasks undertaken by the University and the retention schedule is therefore arranged accordingly to reflect the business processes undertaken.

Departments/teams must have at least one destruction event per year. Using their Records Retention Schedule to destroy the records in each series which have reached their destruction date. For more information/advice contact Governance Services.

1. What does the Records Retention Schedule Cover?

The Records Retention Schedule provides generic guidance on retention of records, which Universities commonly generate in the course of:

- Their core academic work;
- Managing the University as a corporate body;
- Developing their relationship/s with their stakeholders.

It covers key groups of records generated by the common business functions and business activities of Universities. The retention periods in this document have been approved after consultation with key stakeholders following guidance from sources such as the JISC Records Retention Schedule, which is based on extensive research and consultation with a wide range of Universities. However, it is not intended to be either prescriptive or exhaustive, but as detailed as possible to assist users with managing records.

2. **Reviewing the Records Retention Schedule**

This Records Retention Schedule will be reviewed periodically to ensure it still meets requirements – minor updates as and when required and a general review biennially. *Update and review approval sign off protocols in agreement with Head of School/Department/Service and Records Manager (Governance Services).*

ii) **What does the Records Retention Schedule contain?**

1. **Arrangement and Description of Records**

For each business activity, the schedule lists common groups of records which relate to individual sub-activities or processes. For example:

Procurement
Records from this process include: strategy development, performance management, planning, policy development, supplier approval, supplier contract tendering, supplier contract management and purchasing administration.

or

Course Development and Accreditation
Records from this process include: Course Handbooks, Course Catalogue, Curriculum Document, CPD Course Accreditation.

(Please delete examples as necessary and include an example which is relevant to the business activity to which this RRS relates)

2. **Retention Period and Trigger Point**

Statutory retention periods are indicated by a citation. These should be regarded as minimum retention periods. For business reasons, it may be advisable to retain some records for longer than these statutory periods.

All other retention periods are recommended minimum periods, based on assessments of common University needs and potential legal liabilities.

Although retention periods are often dictated by legislation and regulations, they are related to the rationale for keeping the record in the first place and therefore frequently required for business needs and external bodies. If this is the case, this information should be included in the 'Citation/Rationale' column for future reference (*) e.g. RRS review.

The 'trigger point' is when the retention period starts and this may be the current financial year (CFY), termination date (T) which may apply to supplier contracts, employment contracts, student status, etc. Trigger points can be specific e.g. contract termination (T) or general (CFY) depending on the citation.

Common acronyms e.g. 'CTY' are listed at the bottom of each page of the records retention schedule.

3. **Retained by**

This section details where the master record e.g. 'original' should be retained and who has responsibility for keeping it (job title, not individual's name).

4. **Citation/Rationale**

Citations are given for key Acts of Parliament, Statutory Instruments and Regulations, which are relevant to determining retention periods for the groups of records concerned. Those cited should not be regarded as the only ones that may be relevant. As mentioned above in 2) (*) the rationale for keeping the record in the first place is useful for deciding the retention period and particularly when reviewing the records retention schedule. Please note here if the retention period is dictated by business requirements.

5. **Final Action**

Final action details what should happen to the record once it no longer needs to be retained. There are some documents which will be of archival value to the University and these should be retained permanently. If a document is to be retained for a long period or permanently, special arrangements will be made to transfer it off-site to a storage facility. Governance Services can provide advice and assistance with this.

Many of the records the University staff members create and manage will contain personal information. It is important to ensure that these records are disposed of correctly and in line with guidance issued by the University's Data Protection Officer. Records which contain personal or sensitive personal information should be disposed of by using the shredding consoles which available in all University premises.

6. Records Category, Storage Location & Format

Records should be categorised as to whether they are Vital, Important, Useful or Non-Essential as this may affect how they are stored e.g. vital records may be kept in a fire proof safe, electronically and off-site, whilst Non-Essential records may only be stored electronically. Vital records should also be listed on Business Continuity Plan documents.

The storage location information is necessary to a) ensure records can be found (for both use and disposition), b) identifying copies (those not holding the golden copy/master record can be sure theirs is a copy and therefore ephemeral), and c) inform future RRS reviews.

The format in which records are detailed here along with the location details. The format can be described simply as H, E or H+E (e.g. hardcopy, electronic or both formats).

A physical (e.g. CR = Craiglockhart, ME = Merchiston and SI = Sighthill, together with a specific room number) and/or an electronic (e.g. S:Drive or Sharepoint) location is stated under this section. Where relevant, the information about off-site storage must also be provided.

7. Records Destruction (including electronic records)

Service Areas and Schools must ensure that regular disposal events are scheduled, at least annually, but more often where there are retention periods less than a year e.g. during a quieter period of the year an annual destruction event is scheduled to ensure records which have reached the end of their retention period are destroyed.

Please ensure a Record Disposal Form (see Appendix A) is completed whenever records are destroyed. These would be permanent records. The form will be retained centrally by Governance Services. A copy of the disposal form is also available on the staff intranet.

Back-up copies stored by Information Services and/or other areas of the University must be destroyed at the same time as the 'golden' copy (other copies may be destroyed before this according to business requirements).

A 'hold' should be placed on the destruction date for records if there the information is required in response to a request under information legislation or litigation purposes. This 'hold' can be applied by removing the information in question from a repository where it would be destroyed in the course of normal procedures e.g. removing it from an archive box which is managed off-site and scheduled from destruction. However, a review/new destruction date must be set to ensure that once the information has been used for the legal purposes it was required for it is re-scheduled for destruction in due course.

Please ensure that the destruction of records complies with the Manual and Physical Data Security Policy (section 5 refers) and Guidance on the Safe Disposal of Confidential Waste.

On the first Monday in July each year, the Equate team will ensure that records no longer required as per the Retention schedule will be disposed off as noted (destroyed/destroyed confidentially/archived). The Records Disposal form (vi) will be completed, signed off and copied to Governance Services prior to disposal.

Date Destruction Day Due									
Date Completed									

8. Records Retention Schedule Approval Process

(Departmental procedure to be agreed with Governance Services e.g. minor updates aggregated for annual review and approval by Director of Service/Institute, Head of School, etc.)

iii) **Legislation affecting the management of Equate Scotland Records**

Acts and Statutory Instruments

1973 c.52	Prescription and Limitation (Scotland) Act 1973
2010 c.15	Equality Act 2010
2016/679	General Data Protection Regulation
2018 c.12	Data Protection Act 2018

Other provisions

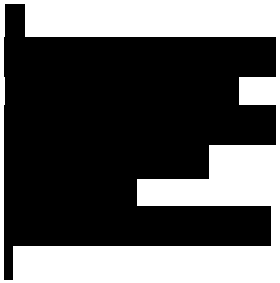
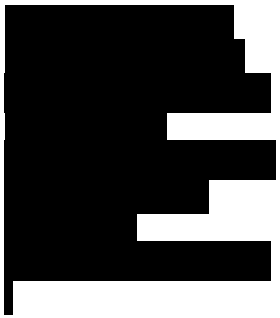
e.g.
Immigration Rules Specific guidance for keeping documents can be found on the Home Office UKBA website at: http://www.ukba.homeoffice.gov.uk/sitecontent/documents/employersandsponsors/pbsguidance/guidancefrom31mar09/appendix-d1.pdf?view=Binary

iv) **Retention Schedule**

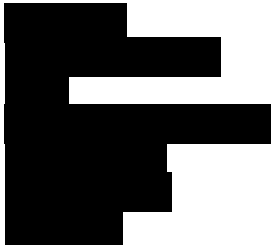
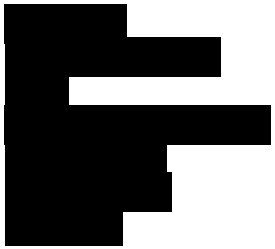
Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
1. Finance							
1.1	Project Budget Accounts Paper and electronic	Life of Project + 2 years. Restricted access on S Drive	Project Administrator/ Office Co-ordinator (restricted access on S drive	Business requirement – kept for audit purposes and reference	Review for archival value	U	[redacted]
1.2	Internal Orders (room bookings, catering, paper requests, C&IT software orders) (COPIES). Paper and electronic	CFY + 1	Project Administrator/ Office Co-ordinator (restricted access on S drive	Business need for reference but originals held by Finance for 5 years	D (Con)	U	[redacted]
1.3	Purchase card records – card statements and receipts (COPIES). Originals with Finance. Paper and electronic	CFY +1	Project Administrator/ Office Co-ordinator (restricted	Business need for reference but originals held by Finance for 5 years	D (Con)	N E	[redacted]

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
			access on S drive .				[redacted]
1.4	Purchase orders (COPIES). Originals with Finance. Paper and electronic	CFY +1	Project Administrator/ Office Co-ordinator (restricted access on S drive	Business need for reference but originals held by Finance for 5 years	D (Con)	N E	[redacted]
1.5	Expenses Claim forms (Fin3,Fin 4, Fin 5, Travel claims) COPIES – originals held by Finance/HR. Paper only	CFY + 1	Project Administrator/ Office Co-ordinator (restricted access on S drive	Business need for reference but originals held by Finance for 5 years	D (Con)	N E	[redacted]
1.6	Quotes from suppliers and contracts. Paper and electronic	Duration of contract + 1	Project Administrator/ Office Co-ordinator (restricted access on S drive	Business need for reference	D (Con)	U	[redacted]

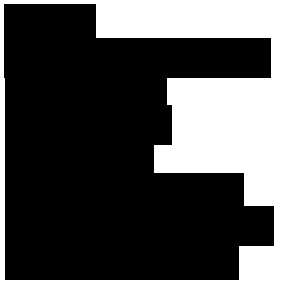
Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
							[redacted]
1.7	Quarterly claims. Paper and electronic	Duration of contract + 1	Project Administrator/ Office Co-ordinator (restricted access on S drive	Business need for reference		U	[redacted]
1.8	Commercial contracts and NEW Supplier details. Paper and electronic.	Duration of contract + 1	Office Co-ordinator	Business requirement – kept for audit purposes and reference	D (Con)	I	[redacted]
2. Human Resources							
2.1	All HR records (inc. absence, leave, Occupational Health, myContribution) other than those listed below are held on HR Connect		HR				[redacted]

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
2.2	Flexitime sheets	CAY + 1year	Individual member of staff	Business decision in case of dispute	D (Con)	I	
2.3	Job Descriptions	Superseded	Office Co-ordinator (restricted access on S Drive	Reference/ Business need	D	I	
2.4	References (letters of reference) for Employment	C + 1	Office Co-ordinator	To protect the university against legal action	D (con)	U	

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
3. Administration of all project events (see Section 4 for Careerwise)							
3.1	Delegate registrations for events	within 3 months of event	Eventbrite/ Equate Database (Raisers Edge)	Data held by Eventbrite for duration of our account with them for legal and business purposes	D (Con)	NE	[redacted]
3.2	Delegate list	End of project	Events Organiser	Business need	D (Con)	NE	[redacted]
3.3	Programme	End of project	Project Officer/Events Organiser	Business need for reference	D	NE	[redacted]
3.4a	Feedback forms (anonymous) online	Within 3 months of event	Events organiser	Data used for project reports	D	NE	[redacted]

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
3.4b	Hardcopy Feedback forms (anonymous)	End of Project + 1 year	Events Organiser	Data used for end of project reports or general Equate reports	D	U	
3.4c	Evaluation reports	End of Project + 1 Year	Events Organiser	Data used for project reports	D	U	
3.5	Internal Strategy and planning documents	Permanent	Director	Needed for business planning for organisation	A	V	
3.6	Equal opportunities form (anon) and online	Within 3 months of event	Events organiser	To provide data to funders	D	V	
3.7	Course materials	Project end + 3 years	Project Officer/Events Organiser	Business need	A	V	

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
							[redacted]
3.8	Marketing materials (flyers, design templates); end of project report	Superseded	Events Organiser	Report held for record purposes.	A	U	[redacted]
3.9	Career Clinics: enquiry forms and follow up emails	1 year from completion of Career Clinic	Career Coach	Documents held for 1 year in case of repeat appointments	D-CON	U	[redacted]
4. CareerWise Project							
4.1	Placements – applications (CVs)	3 years from last contact (must be password protected)	Project officer	Needs to be kept to support student development	D-CON	V	[redacted]

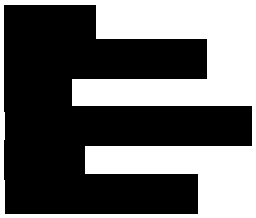
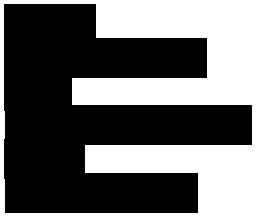
Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
4.2	Employers – Job descriptions	1 year from receipt	Project officer	Needed for funding reporting	D	V	
4.3	Events and Workshops - programmes	Superseded	Project officer	Used as template for future events and evaluation	D	NE	
4.4	Annual reports	Project end + 3 years	Project Officer	These are kept for funders and publication of our impact	A	V	
4.5	Delegate List	within 3 months of event	Administrator	Business need	Dcon	NE	

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
4.6	Feedback forms (anonymous)	within 3 months of event	Administrator	Data used for project reports	D	N E	
4.7	Equal Opportunities forms (anon)	To end project + one year	Administrator	To provide data to funders	D	N E	
5. Marketing							
5.1	Flyers/Visuals/original design content	Superseded	Events organiser	Business requirement	A	I	
5.2	Photos	Permanent	Events organiser	Business requirement	A		
5.3	Photo/recording permission	Permanent	Events organiser	Business requirement	A	V	

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
6. Committees and partnerships							
6.1	Steering Committee – members' details	Permanent.	Office Co-ordinator	To keep updated for contact info	D (CON)	I	[redacted]
6.2	Agenda and minutes	Permanent	Office Co-ordinator	For reference	D (CON)	I	[redacted]
6.3	Memos of Understanding with Partners	For duration of contract	Training and development manager. Golden copies with Finance	For reference	D (CON)	I	[redacted]
7. Consultancy/External training delivery							
7.1	Organisation details (client)	CFY + 1	Office Co-ordinator/ Project Officer	Business requirement – kept for audit purposes and reference.	D (Con)	I	[redacted]
7.2	Training materials	CFY + 1	Project Officers	Business requirement – kept for audit	A	V	[redacted]

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
				purposes and reference.			[redacted]
8. Coaching for Success							
8.1	Individual coaching – coachee applications	Life of Project + 1 year	Events Organiser	Business requirement – kept for audit purposes and reference.	D (Con)	U	[redacted]
8.2	Coaches' details	Until end of coaching programme + 1 year	Office Co-ordinator	Supplier and ESI details for HMRC held for purchase ordering purposes until coaching programme ceases.	D (Con)	U	[redacted]

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
							[redacted]
8.3	Organisational coaching (agreements)	CFY + 1	Events Organiser	Reference for business needs and audit	D (Con)	I	[redacted]
9. Careerhub							
9.1	Event registrations	within 3 months of event	Events organiser	As above	D	NE	[redacted]
9.2	Job descriptions and adverts	C+1	Industry recruitment coordinator	Needed for business requirements	D	NE	[redacted]

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
9.3	Marketing materials	Superseded	Industry recruitment coordinator	Needed for business requirements	R	I	
9.4	Annual reports and evaluations	Project end + 3	Industry recruitment coordinator	Needed to report to funder	A	V	
10. Funding bids and applications							
10.1	Application details	Project end + 3	Office Coordinator. Golden copies with Finance	Business requirement	A	V	
10.2	Contract Award information	Project end + 3	Office Coordinator. Golden copies with Finance	Business requirement	A	V	