RECORDS RETENTION SCHEDULE

Graduate Apprenticeship Programme

Revision and Signoff Sheet

Change Record

Document Control Information	
Title (Full name of current version: title, version number, status)	Graduate_Apprenticeship_Programme_Records_Retention_Schedule_V1.0
Date approved	09/10/2019
Approved by	███████
Responsible manager/team	Employment Liaison & Recruitment Manager
Review frequency	Annually
Next review date	Aug 2020
Scope	All staff responsible for Graduate Apprenticeship Programme

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)**
08/08/19	███████		0.1	Initial draft
22/08/19	████████	0.1	1.0	Completed all fields except location

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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;

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- 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)

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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.

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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.

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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.

A destruction day will be held annually, beginning from the year following the date this schedule is published, please record these below:

Date Destruction Day Due	22/08/2020								
Date Completed									

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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 Graduate Apprenticeship Records

(Please delete examples as necessary and include the appropriate references which are relevant to the business activity to which this RRS relates)

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

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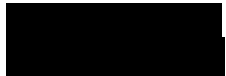
iv) **Retention Schedule**

Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location
1. Registration and Support of Graduate Apprentices						
1.1	Applications: Registration form, signed page of Equalities form, proof of ID, address and qualifications	Until Graduate Apprentice leaves	Employment Liaison & Recruitment Manager	Scottish Skills Development requirement	D-Con	I ████████
1.2	Correspondence (specifically relating to individual GA's)	1 year after Graduate Apprentice leaves	Employment Liaison & Recruitment Manager	BR	D-Con	I ████████
1.3	Procedures/Process	Superseded	Employment Liaison & Recruitment Manager	BR	R	I ████████

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Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
1.4	Leavers Forms	1 year after Graduate Apprentice leaves	Employment Liaison & Recruitment Manager	BR	D-Con	I	████████████████
1.5	Progress Reports	1 year after Graduate Apprentice leaves	Employment Liaison & Recruitment Manager	BR	D-Con	V	████████████████
1.6	Employer Visit documentation	CAY + 1	Employment Liaison & Recruitment Manager	BR	D-Con	V	████████████████
1.7	Attendance Reports	1 year after Graduate Apprentice leaves	Employment Liaison &	BR	D-Con		████████████████

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Record Series		Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location	
			Recruitment Manager			V	███████████
2. Employer Liaison							
2.1	Agreements	End of relationship + 6	Employment Liaison & Recruitment Manager	1973 c.52	R	V	████████████
2.2	General Correspondence	End of relationship + 6	Employment Liaison & Recruitment Manager	1973 c.52	R	I	████████████
2.3	Job Descriptions	End of relationship + 6	Employment Liaison & Recruitment Manager	1973 c.52	R	I	████████████

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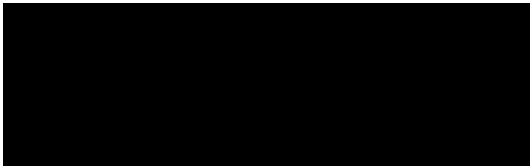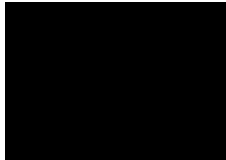
	Record Series	Retention Period & Trigger	Retained by	Citation/ Rationale	Final action	Records category (Vital/Important/Useful/Non-essential) & storage location
2.4	Assessment Centre Documentation (including interview criteria)	End of relationship + 6	Employment Liaison & Recruitment Manager	1973 c.52	R	I ■■■■■■■
3. Skills Development Scotland Liaison						
3.1	Communications	CAY + 1	Employment Liaison & Recruitment Manager	BR	R	I ■■■■■■■
4. Marketing						
4.1	All marketing materials	Superseded + 1	Employment Liaison & Recruitment Manager	BR	R	I ■■■■■■■

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v) **Approval**

<table>
<tr>
<td>Signed</td>
<td>██████████████████</td>
<td>Date</td>
<td>**09/10/2019**</td>
</tr>
<tr>
<td>Print Name</td>
<td>**Scott Killen**</td>
<td colspan="2">Job Title **Employer Liaison and Recruitment Manager**</td>
</tr>
<tr>
<td>Signed
(Governance Services)</td>
<td>██████████</td>
<td>Date</td>
<td>09/10/2019</td>
</tr>
</table>

This signed off schedule authorises School of Computing Graduate Apprenticeship Staff to destroy life-expired records they hold in accordance with the recommended retention periods and to provide a copy of all Records Disposal Forms to Governance Services. It must not be amended without first consulting Governance Services.

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vi) **Records Disposal Form**

Edinburgh Napier
UNIVERSITY

RECORDS DISPOSAL FORM
This form must be completed before disposal of University records.
If you require assistance please contact the Governance Adviser (Records Management) Governance Services, 0131 455 6359.

Please use block capitals when filling in this form
School/Service Area_____ Contact Name_____ Extension_____

Records Series Number e.g. 4.1	Department Reference/Name/Description	Format e.g. Electronic/ Microfiche/Physical	Start/ Creation date	End/ Trigger date	Reason for Destruction e.g. as per RRS (CAY + 5 years) If different to or not on RRS contact the Records Manager	Method of Disposal e.g. shredding, confidential waste

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Destruction Approvals:

_____   _____   _____

Head of School/Department/Service   **Signature**   **Date**

_____   _____   _____

Records Manager   **Signature**   **Date**

_____   _____   _____

Destroyed By   **Signature**   **Date**

Please retain this form within the school/service area and return a copy to Governance Services, email: DataProtection@napier.ac.uk

Please ensure:
1) There is no pending litigation before destroying records
2) Records are disposed of in accordance with the recommended guidelines, which are available on the staff intranet or from Governance Services

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