

Records Retention Policy

General Principles & Responsibilities

Approved by Information Services Board on 24th May 2010

1 Purpose and Scope

- 1.1 This policy relates to records (including electronic data) belonging to Queen Mary University of London (QMUL) and applies throughout the University, including, where appropriate, its subsidiaries and partner organisations as defined in paragraph 2.7.
- 1.2 This policy is formed of two parts: this document sets out the general principles and responsibilities while the [Records Retention Schedule](#), as defined in paragraph 2.4, sets out the length of time QMUL's records should be retained.
- 1.3 Records, as defined in paragraph 2.1, are a vital asset required by QMUL to support its daily functions, policy formation and decision-making; they protect its rights and those of its staff, students and others and they form the corporate memory. The management of records is therefore imperative and QMUL recognises the importance of this activity.
- 1.4 The purpose of this records retention policy (and associated retention schedule and procedures) is to promote best practice in records management in order to protect the interests and support the core functions of QMUL by ensuring the consistent and orderly maintenance and retention of adequate, unaltered and accurate records for the appropriate periods of time to satisfy relevant statutory and contractual legal, financial, operational and research requirements. It is also to ensure the prompt and confidential disposal of records when such requirements have ceased so as to avoid unnecessary costs relating to records maintenance or any possible liabilities. QMUL also desires to abide by the Lord Chancellor's Code of Practice issued under s.46 of the Freedom of Information Act 2000 to enable it to comply with its statutory obligations under that Act.
- 1.3 This policy is subject to the laws and regulations of relevant jurisdictions and may be modified and supplemented from time to time. Other policies may be relevant in relation to records retention (see [appendix 1](#) for a non-exhaustive list).

2 Definitions

- 2.1 *Records* are defined as "information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business" (ISO 15489-1:2001 s.3.5).
- 2.2 *Recorded information* includes documents and data and can be in any format or media, including paper, film and digital or electronic media (see [appendix 2](#) for a non-exhaustive list of possible formats). This policy applies to recorded information in all possible formats.
- 2.3 *Records management* includes the processes for implementing records retention and disposal, storage and retrieval, in accordance with this policy and associated retention schedule and procedures.

- 2.4 A *records retention schedule* is a document (e.g. list or matrix), tailored for a particular entity or department, describing the different records series belonging to each function of that entity and specifying the appropriate retention period for each, as determined by legal and other relevant requirements. This retention period may include the starting point for its calculation, the length of time and what action should be taken when the period expires. The Records Retention Schedule forms part of this policy.
- 2.5 A *records series* is a group of similar or related records which serve a common purpose or function and have the same retention period. (Examples of records series are employee personnel files, accounts payable invoices, exam papers).
- 2.6 References to “QMUL”, “Queen Mary”, “the University”, “it”, “we” or “us” mean Queen Mary University of London and all entities, wherever located, which are subsidiaries of QMUL.
- 2.7 References to “partner organisations” include any partner organisations and any third party service providers who are contractually obliged to maintain records on QMUL’s behalf in accordance with this policy.

3 Principles

- 3.1 Records that are created or received and maintained by QMUL employees - and those working for QMUL as contractors, volunteers or in partner organisations - in the course of their business activities and research for QMUL, are deemed to be records belonging to QMUL. This applies whether or not the records are held on QMUL premises.
- 3.2 University records are a valuable resource as sources of information for re-use and as evidence of actions, rights, transactions and obligations. However, records that are out-of-date, inadequate or unnecessary can be misleading and can impact storage / retrieval capability and costs, without corresponding benefit.
- 3.3 To manage this resource, each department may have its own adapted procedures covering retention and disposal, storage and retrieval of its records which are implemented consistently and updated as necessary.
- 3.4 During their retention period, records may be held in different locations and on different media depending on operational efficiency but should always be properly managed in accordance with this and other policies.
- 3.5 The majority of records will eventually be destroyed, however, the small proportion of records and artefacts deemed to be of permanent legal or historical significance will be preserved in QMUL’s [historical archives](#) facilities.
- 3.6 Retention policies for different series of records should be decided on the basis of any relevant legal requirements and a consideration of the value of the records for operational reasons both now and in the future.

- 3.7 Retention policies should be decided in consultation with the owners and users of records. If necessary, expert advice should be sought from appropriate external legal sources.
- 3.8 Retention policies should be the same for the same type of recorded information regardless of media (i.e. information retained only in digital format should be retained for the same period as it would be kept if in paper form). However, it is not necessary to retain duplicate copies of the same record, nor to retain both paper and electronic versions, for the same period. Retention arrangements for electronic records should ensure that they will remain complete, unaltered and accessible throughout the retention period.
- 3.9 Operational retention requirements should be based on an assessment of the value of the information, taking into account the need for evidence of processes, the probability of future use and the consequences if the information were not available. Information value and reference rate usually decline over time so a decision should be made as to the point the records are likely no longer to be required.
- 3.10 Retention policies for different series of records should be codified in records retention schedules compiled on a functional or departmental basis and regularly implemented and updated by staff with records management expertise.

4 Responsibilities

- 4.1 Ultimate responsibility for compliance with this policy shall lie with the Queen Mary Senior Executive.
- 4.2 QMUL's Records & Information Compliance Manager is responsible for drawing up guidance for good records management practice, procedures and promoting compliance with this policy as well as maintaining the master Records Retention Schedule.
- 4.3 Within each department a specific person should be responsible for managing the consistent implementation of the records retention policy. This person should make available to other employees the relevant policy, procedures, retention schedules and advice. S/he may also manage the provision of records storage and/or media conversion. S/he may also be responsible for notifying the owners of records when they have reached the end of their retention period, making sure that a disposal or continued retention decision is made and documented and that records no longer to be retained are destroyed or deleted confidentially and completely. Employees within the University with records management responsibility are encouraged to share their knowledge and experience.
- 4.4 Line managers and supervisors must ensure that their staff are adequately trained and are made aware of the key principles of this and related policies.
- 4.5 All employees are responsible for ensuring that accurate and adequate records relating to their areas of responsibility are maintained. They are also responsible for records inherited from predecessors in their role. They are also responsible for the disposal or storage of their records when they cease to be in regular use. This should be done in compliance with the relevant records retention schedule. If these procedures are delegated, appropriate guidance and controls should be

put in place to ensure records are identified and described adequately and the correct retention periods allocated. Employees may also be responsible for making decisions when stored records reaching the end of their retention period are referred to them for review.

- 4.6 Employees who are responsible for authorising the destruction of time-expired records must respond to review requests promptly.
- 4.7 The Archives is responsible for the selection of records for permanent preservation and the maintenance of the archives of QMUL and its predecessor entities.
- 4.8 Compliance with this Policy and related procedures is mandatory. It applies to all sectors, schools and departments in QMUL. Compliance will be monitored by the Records & Information Compliance Manager.
- 4.9 Where permitted by law, any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

5 Contacts

Records & Information Compliance Manager: Paul Smallcombe x.(13) 7596

Appendix 1 – Related Policies

This is a non-exhaustive list of other policies which may be relevant to records retention. These policies may be amended, revised, replaced and supplemented and additional relevant policies created from time to time.

- Data Protection Policy
- Freedom of Information Policy
- Information Security Policies
- Intellectual Property Policy
- Barts Health NHS Trust equivalent policies

Appendix 2 – Possible Records Formats and Media

This is a non-exhaustive list of possible document and other formats that may be records, or hold records. It does not include every possible format. Some formats may be specific to a particular type of media e.g. web sites on digital media; while others may be found in more than one medium e.g. memos and reports may be on paper and/or electronic media.

- Correspondence/letters
- Coursework and exam scripts
- Teaching materials
- Meetings agendas, minutes/notes, supporting papers
- Reports
- Presentations (slides, text, charts, illustrations, etc.)
- Directives and policy statements

- Manuals and instructions
- Drafts
- Forms
- Books of account (or equivalent)
- Financial transactional documents e.g. invoices, statements, etc.
- Legal documents e.g. agreements/contracts, deeds, etc.
- Press releases
- Internal announcements
- Intranet sites
- Technical drawings (including CAD)
- X-rays
- Equipment monitoring/recording records
- Photographs, slides, transparencies and digital images
- Publications e.g. books, brochures, leaflets
- Posters
- Advertisements
- TV & radio commercials
- Film, video and sound recordings
- Microfilm and microfiche
- Memoranda
- E-mails
- Text and MMS messages
- Instant messages
- Voicemails
- Word processing, graphics and spreadsheet applications
- Specialist business IT applications
- Databases
- Data warehouses
- Websites
- Blogs
- Wikis
- Social media posts
- Fixed or removable electronic or optical storage media including:
 - Desktop and laptop computers
 - CD-ROMs, DVDs and optical disks
 - Magnetic tape and disks
 - Miniaturised high density electronic storage devices e.g. memory sticks and SD cards
 - Data held on (smart)phones, tablets and portable digital assistants (PDAs)
 - External hard drives

Appendix 3 – Legal Citations

The following Acts (or Statutory Instruments) of the U.K. Parliament or European Union have been cited in determining retention periods and guidelines.

- 1957 c.31 - Occupiers' Liability Act 1957
- 1958 c.51 - Public Records Act 1958
- 1969 c.57 - Employers' Liability (Compulsory Insurance) Act 1969
- 1970 c.9 - Taxes Management Act 1970
- 1970 c.41 - Equal Pay Act 1970
- 1974 c.37 - Health and Safety at Work etc. Act 1974
- 1980 c.58 - Limitation Act 1980

- 1988 c.48 - Copyright, Designs and Patents Act 1988
- 1992 c.4 - Social Security Contributions & Benefits Act 1992
- 1993 SI 744 - Income Tax (Employment) Regulations 1993
- 1994 c.23 - Value Added Tax Act 1994
- 1994 c.30 - Education Act 1994
- 1999 SI 3242 - The Management of Health & Safety at Work Regulations 1999
- 2000 c.36 - Freedom of Information Act 2000
- 2002 SI 2677 - The Control of Substances Hazardous to Health Regulations 2002
- 2004 SI 3391 - Environmental Information Regulations 2004
- 2010 c.15 - Equality Act 2010
- 2016 General Data Protection Regulation
- 2018 c.12 - Data Protection Act 2018