



STATEMENT OF RECORDS MANAGEMENT PRACTICE AND MASTER RECORDS RETENTION SCHEDULE

Purpose and scope of this document

This document is designed:

- In the 'Statement of Records Management Practice', to set out the Company's framework for the management of its records.
- In the 'Master Records Retention Schedule', to provide recommendations to Company Institutions on minimum retention periods for various classes of records, including an indication of those records that are or might be suitable for permanent preservation within the Company Archives at the Company Library. Institutions are strongly encouraged to follow these recommendations which have been formulated in the context of existing Company policies and guidelines, national legislation and sector-wide best practice standards.

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STATEMENT OF RECORDS MANAGEMENT PRACTICE

1 Scope

- 1.1 The efficient management of the Company's records and information (hereafter collectively referred to as 'records') is necessary to support its core functions, to comply with its legal, regulatory and contractual obligations and to contribute to the effective management of its activities. This Statement sets out the Company's framework for the management of its records.
- 1.2 This Statement applies to all records created, received or maintained by Company staff in the course of carrying out their contractual duties.
- 1.3 This Statement does not apply to records created, received or maintained by staff employed by a Separate Entity, or to records created, received or maintained by staff employed both by the Company and a Separate Entity where those records are held for the purposes of Separate Entity, as opposed to Company, business.
- 1.4 Records are defined as all documents and materials, regardless of format, which facilitate the activities carried out by the Company. These records may be created, received and maintained in hard copy, electronically (including emails), or both.
- 1.5 Various classes of records, such as research records, also may be subject to external and/or specific contractual record-keeping requirements.
- 1.6 Records of some of the Company's activities and functions are maintained using formal electronic document management systems. Where this is the case, the electronic copy of any record is to be regarded as the master record and as legally admissible under relevant legislation, standards and guidance.

2 Objectives

- 2.1 Records management is a discipline designed to ensure the effective, efficient and systematic control of the creation, receipt, maintenance, use, access, distribution, transfer, transmission, storage, security, disposal and destruction of records.
- 2.2 Records management helps to:
 - ensure that the Company conducts itself in an efficient and accountable manner.
 - meet legislative and regulatory requirements.
 - support and document policy formation and decision-making.
 - facilitate the effective performance of activities and delivery of services throughout the Company.
 - provide continuity in the event of a disaster.
 - protect the interests of the Company in the event of litigation or otherwise.
 - establish and maintain the Company's cultural identity and institutional memory.

3 Responsibilities

- 3.1 The Company has a corporate responsibility to maintain its records and records management systems in accordance with legislation.
- 3.2 The Managing Director is responsible for providing guidance and advice on good records management practice within the context of existing Company policies and guidelines, national legislation and sector-wide best practice standards.
- 3.3 Each Company Institution has overall responsibility for the management of the records generated by its activities. An Institution's records management systems, policies and procedures should wherever possible be consistent with the guidance and advice provided by the Managing Directors (including the Master Records Retention Schedule in this document).
- 3.4 Individual members of staff should ensure that records for which they are responsible are maintained and disposed of in accordance with any systems, policies and procedures in place within their Institution.

MASTER RECORDS RETENTION SCHEDULE

INTRODUCTION AND GUIDANCE NOTES

1. The recommendations in this Schedule apply equally to records created, received and maintained in hard copy and electronically.
2. This Schedule sets out the recommended periods for which the Company's records should be retained and details what should be done with those records once their Retention Periods have elapsed. The recommendations within the Schedule apply solely to the Company of Cambridge and not to records held by any Separate Entities, each of which is a separate legal entity and therefore has responsibility for its own records and information.
3. The Company's records may broadly be divided into three categories:

(a) Master Records

These are definitive copies of documents (or spreadsheets, databases, presentations, images, sound recordings, etc.) held by the 'Records Owner'. The Records Owner is either the originator of the Master Record or the current member of staff who is formally responsible for the Master Record as part of their duties. **All Retention Periods recommended in this Schedule relate solely to Master Records.**

(b) Duplicate Records

These are duplicates of Master Records (for example, multiple sets of committee minutes or copies of correspondence in the possession of staff other than the Records Owner). It is recommended that Duplicate Records should be kept for reference only, and for no longer than the Retention Period of the Master Record, and then destroyed.

(c) Transitory Records

These are records which have no significant on-going value after they have served their primary purpose. Some examples of Transitory Records are:

- draft documents and working materials which do not demonstrate significant steps in the development of a final version.
- documents containing requests for information which have no further value after the information is provided or received.
- items received only for information from elsewhere in the Company, often as part of a distribution list.
- items received only for information from external organisations.

It is recommended that Transitory Records should be destroyed in the normal course of business when no longer required.

4. Identifying the Master Records, and the corresponding Records Owner, usually will be straightforward. However, due to the devolved nature of the Company, and the fact that numerous individual members of staff in multiple Institutions may access and use the same records, on occasion it can be difficult to pinpoint the Master Records and corresponding Records Owner. In general:

- (a) If the records are created/updated solely by one member of staff, those will be the Master Records and that member of staff will be the corresponding Records Owner.

Examples	
Master Records	Records Owner
Important emails held in an individual's email account	The individual member of staff
Teaching materials (e.g. slides, handouts, PowerPoints) for a course	The individual member of academic staff
A manager's confidential sickness absence spreadsheet	The manager

- (b) If the records are created/updated by one 'team' of staff (usually within a single Institution), those will be the Master Records and the head of that 'team' will be the corresponding Records Owner.

Examples	
Master Records	Records Owner
Important emails held on an shared HR email account	The HR team leader
Research datasets generated from a project	The Principal Investigator
Departmental examination records	The Departmental Administrator

- (c) If the records are created/updated by multiple 'teams' of staff across different Institutions, the Master Records will be those held by the lead Institution for the activity, initiative or project, and the Records Owner will be the relevant senior member of that lead Institution.

Examples	
Master Records	Records Owner
Submissions to a Company-wide consultation of all Departments	The project manager running the consultation
Records of staff payslips	The Director of Finance
Copies of unsuccessful student applications	The Head of Administration

5. The Schedule suggests recommended Retention Periods based where applicable on relevant legislative requirements. Some of the most important legislative requirements in relation to records retention are as follows:

(a) Data protection legislation

Data protection legislation (notably the UK General Data Protection Regulation and the Data Protection Act 2018) states that records containing personal data (i.e. information relating to living identifiable individuals) should not be kept for longer than necessary before being anonymised or destroyed. Under data protection legislation, organisations need to tell individuals in broad terms about how long their information will be retained. The Company directs various types of individual (applicants, students, staff, and others) to this Schedule for this information, and so it is important that the recommendations herein are adhered to.

This does not mean that all records containing personal data ultimately require anonymisation or destruction. As set out in the Schedule, some identifiable records (e.g. core records about individual students or staff held in major IT systems) justifiably need to be retained in the very long-term for 'active' purposes (e.g. the provision of references). In addition, there are exemptions from the standard principle if records containing personal data are retained solely for the purposes of research, statistics or public interest archiving (which is why certain 'inactive' records may be retained in perpetuity in the Company Archives).

(b) Financial and health and safety legislation

Various financial records have to be retained for a fixed period for tax, payroll or pension purposes. Similarly, various health and safety records (whether relating to general risk assessments or the specific health screening/monitoring of individuals) have to be retained for fixed periods.

(c) Legal documents and claims

Certain legal documents (e.g. contracts or deeds) necessitate a lengthy retention period. Even if a fixed retention period is not set out in a specific piece of legislation, many other records should be retained for a certain number of years to allow the Company to defend itself from legal claims (e.g. proceedings brought under discrimination or employment legislation) or contractual disputes (e.g. with a supplier, collaborator or research sponsor).

6. Staff may be justified in applying different Retention Periods where other factors require consideration, such as an audit investigation, a court case, or on-going institutional requirements. Furthermore, if there are specific or supplementary contractual, legal/regulatory or best practice requirements which determine that certain Company Institutions should keep particular records for longer or shorter Retention Periods than those recommended in the Schedule (or should retain/archive them in specific ways), then those alternative requirements should be followed.
7. The following guidance notes are designed to assist users of this Schedule.

(a) SUBJECT

This column describes the type or 'class' of records involved and applies equally to materials held in hard copy and electronically.

While the Schedule is split into sections and sub-sections largely based around the different Departments, not all of the records listed in this column will be physically or electronically held by the relevant Division. For example, some finance records are generated and stored within Individual Teams rather than the central offices of the different Departments.

Similarly, many records relating to teaching or research are maintained by School, Faculty or Department offices or individual members of staff rather than the relevant central offices.

The Schedule does not list the Records Owner for each class of records, as Master Records in many classes will be held in different ways in numerous Institutions. For example, Master Records relating to procurement are held both in the Procurement Services section of the Department and in individual Teams, depending on the nature of the tender and the procurement process followed. Similarly, Master Records about procedures for numerous matters (e.g. building fire drills or local induction processes) are held throughout the Company. On a few occasions, however, explanatory comments are supplied to assist.

(b) RETENTION PERIOD

This column sets out the recommended length of time for which the records should be kept within Schools, Faculties, Departments, UAS Divisions or other Company Institutions as a matter of course.

Retention Periods are often described as:

['Trigger' point] + [Number of additional years to be kept]

(c) ACTION AT END OF RETENTION PERIOD

This column sets out the recommended action to be taken once the Retention Period has elapsed. There are four standard options:

(i) Send to Company Archives.

Certain records have historical value and should be preserved in perpetuity. It is recommended that the Records Owner should contact the Company Archives at the Company Head Office to arrange a mutually convenient time to transfer the records to the Company Archives.

- (ii) **Send to Company Head Office.**
This Department collects series of official Company publications. It is recommended that the Records Owner should contact the Head Office to make arrangements for the routine transfer of the records.

- (iii) **Destroy.**
It is recommended that the Records Owner should confidentially destroy the records. Paper records should be shredded or recycled (depending on the sensitivity and confidentiality of their contents). Electronic records should be securely deleted. (Wholesale backups of IT systems containing electronic records for disaster recovery purposes are not deemed to be active records. Therefore electronic records are considered to be 'destroyed' when the Records Owner performs the deletion.)

- (iv) **Initiate Archival Review Process.**
The Archival Review Process is designed to formally appraise and determine whether all, part or none of the records have historical significance and should be retained in perpetuity. It is recommended that the Records Owner should contact the Company Head Office, which will either offer immediate guidance or arrange a Review Meeting.

Please note that there are also a range of non-standard options listed at various points in the Schedule; these should be self-explanatory.

SECTION 1 GOVERNANCE AND STRATEGY

	SUBJECT	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
1.1	OFFICIAL PUBLICATIONS		
	1.1.1 Official Company publications	None: one copy to be sent to Head Office upon publication	Send to Head Office
	1.1.2 Records detailing the design, commissioning, editing and production of an official publication	Issue of publication + 3 years	Destroy
1.2	COMMITTEES, BOARDS, SYNDICATES, WORKING GROUPS, ETC.		
	(Excluding committees dealing with individual student cases [for which see 2.4] and Examination Boards [for which see 2.3.11]))		
	1.2.1 Membership and appointment records	End of an individual's tenure + 6 years	Destroy
	1.2.2 Ballot papers for elections	Completion of election + 3 months	Destroy
	1.2.3 Registers of interests	End of an individual's tenure + 6 years	Destroy
	1.2.4 Agendas, minutes and papers for major Company committees.	End of current year + 5 years	Send to Company Archives
	1.2.5 Agendas, minutes and papers for all other committees and working groups	End of current year + 5 years	Initiate Archival Review Process
	1.2.6 General working and organisational papers relating to committee business	End of current year + 5 years	Destroy (in the case of very significant committees: Initiate Archival Review Process)

1.3	STRATEGIES, PLANS, POLICIES AND PROCEDURES (Many of these records will be held as part of Committee papers and minutes [for which see 1.2] or within the published <i>Statutes and Ordinances</i> or <i>Reporter</i> [for which see 1.1])		
	1.3.1 Final major strategy documents	Until superseded by new strategy + 5 years	Send to Company Archives
	1.3.2 Working papers used in developing and updating major strategies	Issue of strategy + 5 years	Destroy
	1.3.3 Final plans for implementing major strategies	Until superseded by new plan + 5 years	Destroy
	1.3.4 Working papers used in developing and updating plans for implementing major strategies (e.g. analyses, management information reports, benchmarking exercises and performance monitoring)	Issue of plan + 5 years	Destroy
	1.3.5 Final policy documents	Until superseded by new policy + 5 years	Send to Company Archives
	1.3.6 Working papers used in developing and updating policies	Issue of policy + 5 years	Destroy
	1.3.7 Final procedural documents	Until superseded by new procedure + 5 years	Initiate Archival Review Process
	1.3.8 Working papers used in developing and updating procedures	Issue of procedure + 5 years	Destroy
1.4	GOVERNMENT AND SECTOR REGULATOR RELATIONS		
	1.4.1 General communications with governmental or parliamentary bodies and sector regulators (including enquiries and responses provided)	While necessary for reference and future planning purposes (as a general guide: End of current year + 6 years)	Destroy
	1.4.2 Formal responses to governmental, parliamentary or regulatory surveys and consultations	Submission of response + 5 years	Initiate Archival Review Process
	1.4.3 Records of the Company's formal participation in governmental or parliamentary or public inquiries	Completion of inquiry + 10 years	Initiate Archival Review Process
1.5	HIGHER EDUCATION SECTOR RELATIONS		

	1.5.1 Records documenting the Company's membership of sector-wide bodies	Until superseded by renewed membership records	Destroy
	1.5.2 Working papers documenting the Company's involvement with sector-wide bodies	End of current year + 5 years	Destroy
	1.5.3 Formal responses to surveys and consultations run by sector-wide bodies	While necessary for reference and future planning purposes (as a general guide: Submission of response + 6 years)	Destroy
1.6	FRAUD, WHISTLEBLOWING AND INFORMATION/COPYRIGHT COMPLIANCE		
	1.6.1 Fraud and whistleblowing case files	Last action on case + 6 years	Destroy
	1.6.2 Records regarding the Company's interactions with the Information Commissioner's Office	End of current year + 6 years	Destroy
	1.6.3 Requests for personal data under data protection legislation	Last action on request + 6 years	Destroy
	1.6.4 Records of consent under data protection legislation	Until relevant personal data is anonymised or destroyed	Destroy
	1.6.5 Records of forms and portals used to secure consent under data protection legislation	Until associated personal data is anonymised or destroyed	Destroy
	1.6.6 Freedom of Information Publication Scheme	Until superseded by new Scheme + 5 years	Destroy
	1.6.7 Requests for information under the Freedom of Information Act 2000	Last action on request + 6 years	Destroy
	1.6.8 Records retention schedules	Until superseded by new documentation + 1 year	Send to Company Archives
	1.6.9 Records detailing the outcomes of archival appraisals	Completion of appraisal process + 10 years	Destroy
	1.6.10 Records regarding the upkeep of the Company's copyright licences	End of current year + 15 years	Destroy
	1.6.11 Records concerning applications to copy outside the standard terms of a licence	Period for which permission is granted + 6 years	Destroy
	1.6.12 Records of inspections by copyright holders	Inspection + 1 year	Destroy

1.7	RISK MANAGEMENT AND INTERNAL AUDIT (Some of these records will be held as part of Committee papers and minutes [for which see 1.2])		
	1.7.1 Strategic and operational risk registers	Until superseded by updated register + 5 years	Destroy
	1.7.2 Working papers on the identification, assessment and management of risks to the Company	Until risk no longer applicable + 3 years	Destroy
	1.7.3 Disaster response and recovery plans, emergency management plans, business continuity plans	Until superseded by new plan + 5 years	Destroy
	1.7.4 Internal audit reports issued to the Company, and records of actions taken to address issues raised (for annual audits of the Financial Statements, see 5.1.4)	Completion of audit + 7 years (though longer retention periods may be necessary depending on findings)	Destroy
1.8	LEGAL DOCUMENTS AND SERVICES		
	1.8.1 Contracts and legal agreements on all topics (including supporting documentation and legal advice)	End of contract + 6 years (under signature) End of contract + 12 years (under seal)	Destroy
	1.8.2 Leases and lease agreements	Expiry of lease + 15 years	Destroy
	1.8.3 Claims by or against the Company which do not proceed to litigation or are settled by agreement (including supporting legal advice)	Withdrawal or settlement of claim + 6 years	Destroy
	1.8.4 Litigation with third parties where legal precedents are set (including supporting legal advice)	Settlement + 6 years	Retain core record in perpetuity under the supervision of the Company's legal advisor
	1.8.5 Litigation with third parties where legal precedents are not set (including supporting legal advice)	Settlement + 6 years	Destroy
	1.8.6 Records relating to Trusts	Until Trust wound up or subsumed	Initiate Archival Review Process

	1.8.7 General legal advice on matters of the Company's status, governance, industrial relations and health and safety	Until superseded by fresh advice + 12 years	Destroy
	1.8.8 General legal advice on other matters	Until superseded by fresh advice + 6 years	Destroy

SECTION 2 STUDENT ADMINISTRATION

	SUBJECT	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
2.1	CORE STUDENT RECORD (Relating to individual students)		
	2.1.1 Core electronic and paper records about individual students, including: (a) basic personal details (b) information gathered at application (c) information gathered at registration (d) courses undertaken, including relevant dates of teaching and assessment and Separate Entity affiliations (e) information on academic progress and performance, including assessment outcomes (f) any supplementary information required for professional accreditation (g) summary information on examination allowances (h) transcript (i) reference(s) from the Company	Student graduation or departure + 6 years	Destroy (though longer retention periods may be necessary in some cases)
2.2	STUDENT RECRUITMENT, OUTREACH AND ADMISSIONS		
	2.2.1 Prospectuses	See 1.1	See 1.1
	2.2.2 Design, conduct and results of recruitment and outreach campaigns, initiatives and events	While necessary for reference and future planning purposes	Destroy
	2.2.3 Records of attendance at/engagement with recruitment and outreach campaigns, initiatives and events	Follow Higher Education Access Tracker (HEAT) retention periods	Destroy
	2.2.4 Anonymised summaries and analyses of enquiry, outreach and recruitment data	While necessary for reference and future planning purposes	Destroy
	2.2.5 Development of general admissions criteria	End of current year + 10 years	Send to Company Archives

	2.2.6 Individual student applications: unsuccessful applicants	Completion of admissions round + 1 year (though longer retention periods may be necessary)	Destroy
	2.2.7 Individual student applications: successful applicants	Held as part of Core Student Record	See 2.1
	2.2.8 Individual student registration information	Held as part of Core Student Record	See 2.1
2.3	STUDENT COMPLAINTS, APPEALS, DISCIPLINE AND MISCONDUCT		
	2.4.1 Individual student complaint files	Last action on complaint + 6 years	Destroy
	2.4.2 Individual student academic appeal files	Last action on appeal + 6 years	Destroy
	2.4.3 Individual student disciplinary files	Last action on disciplinary case + 6 years	Destroy
	2.4.4 Individual student academic misconduct files	Last action on misconduct case + 6 years	Destroy

	2.4.5 Individual student fitness to practice files (and any other records in classes 2.4.1-2.4.4 relating to medical or veterinary education)	Held in perpetuity	N/A
	2.4.6 Individual concerns raised by students where formal procedures (complaints, disciplinary, etc.) are not instigated	Last action on concern + 3 years	Destroy

SECTION 3 TEACHING

	SUBJECT	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
3.1	GENERAL COMPANY TEACHING QUALITY AND STANDARDS		
	3.1.1 Records detailing the development of general Company quality assurance processes for teaching	Held as part of relevant committee papers	See 1.2
	3.1.2 Formal internal reviews of general Company teaching quality and standards: final reports and core working papers	Held as part of relevant committee papers	See 1.2
	3.1.3 Formal external reviews of general Company teaching quality and standards: final reports, submission and supporting documentation	End of review + 10 years	Send to Company Archives
3.2	TAUGHT COURSE DEVELOPMENT, APPROVAL, DELIVERY AND REVIEW		
	3.2.1 Core records detailing the development and approval of individual taught courses (including course content, background statistical and benchmarking information, validation processes)	Held as part of relevant committee papers	See 1.2
	3.2.2 Formal reviews of individual taught courses: final reports and core working papers	Held as part of relevant committee papers	See 1.2
	3.2.3 Anonymised summaries and analyses of student feedback on individual taught courses	While necessary for reference and future planning purposes (at least: End of current academic year + 12 years)	Initiate Archival Review Process
3.3	TAUGHT DEGREE COURSE ACCREDITATION		
	3.3.1 Records detailing the approval and accreditation of taught degree courses from professional, statutory and other formal accreditation bodies	End of accreditation process + 10 years	Initiate Archival Review Process

3.4	TAUGHT PAPER DEVELOPMENT, APPROVAL, DELIVERY AND REVIEW		
	3.4.1 Core records detailing the development and approval of individual papers within taught courses	Held as part of relevant committee papers	See 1.2
	3.4.2 Handbooks and readings lists produced for a cohort of students	Completion of paper by the relevant cohort of students + 6 years (though longer retention periods may be necessary due to external accreditation or other quality assurance requirements)	Destroy
	3.4.3 Teaching and learning materials produced during the life of a taught paper for a given cohort of students (e.g. handouts and VLE resources)	Retention periods will vary according to the nature and medium of the materials and their on-going pedagogic value	Destroy
	3.4.4 Formal reviews of individual taught papers: final reports and core working papers	Held as part of relevant committee papers	See 1.2
	3.4.5 Anonymised summaries and analyses of student feedback on individual taught papers	While necessary for reference and future planning purposes (at least: End of current year + 12 years)	Destroy

SECTION 4 RESEARCH

	SUBJECT	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
4.1	RESEARCH QUALITY, STANDARDS AND GOVERNANCE		
	4.1.1 Records detailing the development of general Company quality assurance processes for research	Held as part of relevant committee papers	See 1.2
	4.1.2 Formal internal reviews of general Company research quality and standards: final reports and core working papers	Held as part of relevant committee papers	See 1.2
	4.1.3 Formal external reviews of general Company research quality and standards: final reports and core working papers	End of review + 10 years	Send to Company Archives
	4.1.4 Records relating to a project's research governance and ethics	Retention periods will vary according to specific ethics committee requirements and the nature and sensitivity of the research (as a general guide: retain for at least as long as the research data associated with the project)	See 4.2.6
	4.1.5 Case files relating to allegations of research misconduct	Closure of case or end of investigation + 7 years	Destroy
4.2	RESEARCH PROJECT DEVELOPMENT AND MANAGEMENT		
	4.2.1 Communications with research funders which lead to research projects	See 5.4.2	See 5.4.2
	4.2.2 Communications with research funders which do not lead to research projects	Last action on proposed project + 3 years	Destroy

	4.2.3 Records detailing the formation and management of partnerships and other collaborations to undertake research	Life of partnership or collaboration + 6 years (though longer retention periods may be necessary due to specific contractual requirements)	Destroy
	4.2.4 Research project design and preparatory papers (generally held by the Principal Investigator) where the project is pursued	Completion of project + 6 years	Destroy
	4.2.5 Research project design and preparatory papers (generally held by the Principal Investigator) where the project is not pursued	Last action on proposed project + 3 years	Destroy
	4.2.6 Research data, lab notebooks and working papers produced through the life of the project	Retention periods will vary according to specific contractual requirements and the nature and sensitivity of the research (as a general guide: Completion of project + 10 years)	Actions will vary according to specific contractual requirements and the nature and sensitivity of the research (as a general guide: Destroy)
	4.2.7 Papers (generally held by the Principal Investigator) detailing the overall management of research projects	Completion of project + 6 years (though longer retention periods may be necessary due to specific contractual requirements)	Destroy

	4.2.9 Final research outputs (formal publications etc.)	None: one copy to be archived immediately upon publication (note that duplicate copies may be required by funders or sponsors)	Send to the Company's digital Repository (OneDrive) (if suitable for open access)
4.3	RESEARCH COMMERCIALISATION		

SECTION 5 FINANCE

	SUBJECT	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
5.1	GENERAL FINANCE		
	5.1.1 Annual Financial Statements: final copy	See 1.1	See 1.1
	5.1.2 Annual Financial Statements: preparatory documents	End of current financial year + 6 years	Destroy
	5.1.3 Financial Regulations and Procedures	Until superseded by new edition + 5 years	Send to Company Archives
	5.1.4 Financial audits and actions taken to address issued raised	Completion of audit + 10 years (though longer retention periods may be necessary depending on findings)	Destroy
5.2	COMPANY ACCOUNTING		
	5.2.1 Purchase orders, purchase invoices, sales invoices, credit card records, expenses payments, petty cash handling, retail sales transactions and other transaction records	End of current financial year + 6 years (though longer retention periods may be necessary due to the specific contractual requirements of a research project funder)	Destroy
	5.2.2 Student accounts and tuition fee records	Student departure + 6 years	Destroy
5.3	INTERNAL ACCOUNTING AND BUDGET MANAGEMENT		
	5.3.1 Preparation and monitoring of annual operating budgets	While necessary for reference and future planning purposes	Destroy
5.4	FUNDING (INCLUDING RESEARCH FUNDING) ADMINISTRATION		

	5.4.1 Administration of research grants from external funders/sponsors	End of grant + 6 years (though longer retention periods may be necessary due to the specific contractual requirements of a research project funder)	Destroy
5.5	TAX		
	5.5.1 Preparation and filing of annual tax returns (incl. VAT)	End of current tax year + 6 years	Destroy
5.6	CASH, INVESTMENT AND ASSET MANAGEMENT		
	5.6.1 Opening and closing of bank accounts	Closure of account + 6 years	Destroy
	5.6.2 Standing order and direct debit instructions	End of instruction + 6 years	Destroy
	5.6.3 Bank statements and associated documentation	End of current financial year + 6 years	Destroy
	5.6.4 Overall management of investment portfolio	Disinvestment + 6 years	Destroy
	5.6.5 Purchase and sale of investments	Date of transaction + 6 years	Destroy
	5.6.6 Valuations of capital assets	Until superseded by new valuation + 6 years	Destroy
	5.6.7 Authorisations to dispose of capital assets	Disposal + 6 years	Destroy
5.7	INSURANCE		
	5.7.1 Insurance Certificates	Expiry of certificate + 40 years	Destroy
	5.7.2 Records documenting the arrangement and renewal of insurance policies	Expiry of policy + 6 years	Destroy
	5.7.3 Claims, and outcomes of claims, against insurance policies	Settlement or withdrawal of claim + 6 years	Destroy
5.8	PROCUREMENT		

	5.8.1 Internal authorisations for procurement	End of current financial year + 1 year (though longer retention periods may be necessary due to the specific contractual requirements of a research project funder)	Destroy
	5.8.2 Supplier evaluation criteria	Until superseded by new criteria + 5 years	Destroy
	5.8.3 Invitations to suppliers to apply for approval	Completion of approval process + 1 year (though longer retention periods may be necessary due to the specific contractual requirements of a research project funder)	Destroy
	5.8.4 Evaluations of supplier applications: approved suppliers	End of approval period + 6 years	Destroy
	5.8.5 Evaluations of suppliers applications: rejected suppliers	Rejection + 1 year	Destroy
	5.8.6 Tender evaluation criteria	End of resulting contract + 6 years	Destroy
	5.8.7 Invitations to tender	End of resulting contract + 6 years	Destroy
	5.8.8 Evaluations of tender applications: approved tenders	End of resulting contract + 6 years	Destroy
	5.8.9 Evaluations of tender applications: rejected tenders	Rejection + 1 year	Destroy
	5.8.10 Supply contracts (and ensuing variations)	End of contract + 6 years	Destroy
	5.8.11 Contract award notices	End of contract + 6 years	Destroy
	5.8.12 Reports on contracts for governmental agencies	End of current financial year + 3 years	Destroy
	5.8.13 Supplier performance monitoring	End of contract + 6 years	Destroy

5.9	SUBSIDIARY COMPANIES (Once established, wholly-owned subsidiary companies are separate legal entities. Guidance on the management of a subsidiary company's day-to-day records may nonetheless be sought from the various sections of this Schedule.)		
	5.9.1 Records concerning the formation of a subsidiary company	Life of company + 6 years	Initiate Archival Review Process
	5.9.2 Proposals for the formation of a subsidiary company where the company was not formed	Last action on proposal + 6 years	Destroy
	5.9.3 Periodic review and oversight of the subsidiary company by the Company	Held as part of the relevant committee papers	See 1.2
	5.9.4 Winding-up or disposal of the Company's interest in the subsidiary company	Winding-up or disposal of interest + 6 years	Initiate Archival Review Process

SECTION 6 HUMAN RESOURCES

	SUBJECT	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
6.1	CORE STAFF RECORD (Relating to individual members of staff)		
	6.1.1 Core electronic and paper records about individual members of staff, including: (a) basic personal details (including emergency contacts) (b) initial application for employment, supporting documentation and related correspondence (e.g. references, statutory checks, right to work, work permits) (c) subsequent successful applications for other jobs within the Company (for unsuccessful applications, see 6.2.2) (d) contract(s) of employment and records of changes to terms and conditions	End of employment + 6 years	Electronic and paper records (whether held centrally or in Departments): Destroy, with the exception of formal, centrally maintained, Company Officer files, which are to be sent to the Company Archives
6.2	PERSONNEL MATTERS (Relating to individual members of staff, and predominantly held within personnel files, whether paper or electronic. For Occupational Health, see 12.4)		
	6.2.1 Job applications: successful applications	Held as part of successful applicant's core staff record	See 6.1
	6.2.2 Job applications: unsuccessful applications	Closing date for vacancy + 1 year	Destroy
	6.2.3 Unsolicited job applications	Receipt of application + 1 year	Destroy
	6.2.4 Records of induction programmes attended	End of employment + 6 years	Destroy

	6.2.5 Records of general training and development programmes attended (see 12.2.2 for records relating to specialist health and safety training)	End of employment + 6 years	Destroy
	6.2.6 Records of general training and development programmes attended where these are a statutory or regulatory requirement (see 9.2.2 for records relating to specialist health and safety training)	End of employment + 6 years	Destroy
	6.2.7 Annual appraisals (including identification of training, development and welfare needs) and records of subsequent actions	End of employment + 6 years	Destroy
	6.2.8 Performance, disciplinary, complaint, grievance and capability proceedings (correspondence outlining concerns, confirmations of implemented support, outcomes of both informal and formal reviews, appeals)	End of employment + 6 years	Destroy
	6.2.9 Remuneration and reward of an individual employee (including records of special rewards and employee authorisations for non-standard deductions from salary)	End of employment + 6 years (where held in personnel files) End of current tax year + 6 years (where held as financial records)	Destroy
	6.2.10 Administration of an employee's contractual holiday (annual leave) entitlement	End of employment + 6 years	Destroy
	6.2.11 Administration of an employee's absence due to sickness	End of employment + 6 years (where held in personnel files) End of current tax year + 6 years (where held as financial records)	Destroy

	6.2.12 Administration of an employee's special leave (e.g. compassionate, study, research)	End of employment + 6 years	Destroy
	6.2.13 Administration of an employee's parental leave	End of employment + 6 years	Destroy
	6.2.14 Entitlements to and calculations of an employee's Statutory Maternity Pay	End of current tax year + 3 years	Destroy
	6.2.15 Records concerning termination of employment (redundancy)	End of employment + 6 years	Destroy
	6.2.16 Retirement records	End of employment + 6 years	Destroy
	6.2.17 References provided by the Company to third parties about an employee	End of employment + 6 years	Destroy
	6.2.18 Staff welfare records about individual members of staff	End of employment + 6 years	Destroy
6.3	WORKFORCE PLANNING, RECRUITMENT AND PROMOTION (Generic; i.e. not relating to individual members of staff)		
	6.3.1 Assessments of workforce requirements	Until superseded by new assessment + 3 years	Destroy
	6.3.2 Design, operation and anonymised results of staff surveys conducted by the Company	While necessary for reference and future planning purposes (as a general guide: Until superseded by new survey + 5 years)	Destroy
	6.3.3 Management succession plans	Until superseded by new plans + 5 years	Destroy
	6.3.4 Vacancy advertisements and job descriptions	Held as part of successful applicant's core staff record	See 6.1
	6.3.5 Management analyses of recruitment effectiveness	While necessary for reference and future planning purposes	Destroy

6.4	STAFF INDUCTION, TRAINING AND DEVELOPMENT (Generic; i.e. not relating to individual members of staff)		
	6.4.1 Development and content of induction, training and development programmes (for IT training, see 8.4.1)	Until superseded by new programmes + 5 years	Destroy
	6.4.2 Anonymised summaries and analyses of feedback on induction, training and development programmes	End of current year + 5 years	Destroy
	6.4.3 Management analyses of induction, training and development effectiveness	While necessary for reference and future planning purposes	Destroy
6.5	REMUNERATION (Generic; i.e. not relating to individual members of staff)		
	6.5.1 Remuneration structures	Until superseded by new structure + 10 years	Send to Company Archives
	6.5.2 General administration of pay reviews	End of current year + 6 years	Destroy
	6.5.3 General administration of special reward schemes (e.g. discretionary pay, bonuses)	End of current year + 6 years	Destroy
6.6	PAYROLL AND PENSIONS		
	6.6.1 Records documenting the calculation and payment of employees' salaries and other payments (for records relating to individual employees, see 6.2.10)	End of current tax year + 6 years	Destroy
	6.6.2 Employer's PAYE records not sent to HMRC	End of current tax year + 3 years	Destroy
	6.6.3 Records formally documenting the Company's involvement in a pension scheme	End of involvement + 5 years	Destroy
	6.6.4 Communications between the Company and a pension scheme's management	While necessary for reference and future planning purposes	Destroy
	6.6.5 Employer and employee contributions to any pension scheme	End of employment + 75 years	Destroy

6.8	EQUALITY AND DIVERSITY		
	6.8.1 Statistical information resulting from equality monitoring	While necessary for reference and future planning purposes	Destroy
	6.8.2 Handling of formal complaints about discrimination	Last action on complaint + 6 years	Destroy
	6.8.3 Formal equality impact assessments, schemes and action plans	Until superseded by new assessment or scheme + 5 years	Destroy
	6.8.4 Annual reports on formal equality schemes and action plans	Date of issue + 5 years	Destroy
	6.8.5 Formal monitoring of the equalities aspects of student admissions and progress	End of current year + 5 years	Destroy
	6.8.6 Formal monitoring of the equalities aspects of staff recruitment and career progression	End of current year + 5 years	Destroy

SECTION 7 COMMUNICATIONS

	SUBJECT	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
7.1	MEDIA AND PUBLIC RELATIONS		
	7.1.1 Formal press releases and media briefings	Date of issue + 10 years (though longer or shorter retention periods may be necessary depending on the nature and sensitivity of the content)	Destroy
	7.1.2 Media contact lists	Until superseded by new or updated list	Destroy
	7.1.3 Media enquiries and responses	Last action on enquiry + 5 years	Destroy
	7.1.4 Monitoring of media coverage	End of current year + 10 years	Destroy
	7.1.5 Enquiries from members of the general public and responses provided	Last action on enquiry + 3 years	Destroy
7.2	BRANDING AND MARKET RESEARCH		
	7.2.1 Records detailing the design of Company branding (logos, etc.)	Until superseded by new branding	Send to Company Archives
	7.2.2 Anonymised market research data	While necessary for reference and future planning purposes (as a general guide: Completion of market research + 5 years)	Destroy
	7.2.3 Records detailing the design and conduct of 'marketing' and advertising campaigns (excluding student and staff recruitment activities, for which see 2.2.2 and 6.3.4 respectively)	Completion of campaign + 6 years	Destroy

SECTION 8 IT SERVICES

	SUBJECT	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
8.1	DEVELOPMENT OF IT SYSTEMS		
	8.1.1 Records of the development, modification and maintenance of major IT systems	Decommissioning of system + 5 years	Destroy
	8.1.2 Initial development of major IT systems that are not implemented	Last action towards development + 5 years	Destroy
	8.1.3 Development of new, non-major IT systems (usually held as project management records)	Termination of project + 5 years	Destroy
8.2	OPERATION OF IT SYSTEMS		
	8.2.1 Routine monitoring of IT systems and actions taken to rectify problems	Decommissioning of system + 6 months	Destroy
	8.2.2 Software licences	Until superseded by new licence + 6 months	Destroy
	8.2.3 Email and connection log data	Date of log + 6 months	Destroy
	8.2.4 Web usage log data	Date of log + 3 months (though longer periods may be set by external usage monitoring services)	Destroy
	8.2.5 Anonymised summaries of log data	While necessary for reference and future planning purposes	Destroy
8.3	INFORMATION SECURITY		
	8.3.1 Records documenting attempted or actual security breaches of IT systems and action taken	Last action on breach + 6 years	Destroy
	8.3.2 Records documenting extraordinary institutional access to individual user accounts	End of access period + 3 years	Destroy
8.4	USER SUPPORT SERVICES		

	8.4.1 Development and content of IT training programmes	Until superseded by new programmes + 5 years	Destroy

SECTION 9 HEALTH AND SAFETY (INCLUDING OCCUPATIONAL HEALTH)

	SUBJECT	RETENTION PERIOD	ACTION AT END OF RETENTION PERIOD
9.1	GENERAL HEALTH AND SAFETY		
	9.1.1 Health and safety inspections and audits and records of actions taken to address issues raised	Completion of inspection or audit + 10 years (though longer retention periods may be necessary depending on findings)	Destroy
	9.1.2 Annual health and safety reports	Held as part of relevant committee papers	See 1.2
	9.1.3 Records detailing the appointment of health and safety advisors	End of an individual's appointment + 5 years	Destroy
	9.1.4 General health and safety information, induction and training materials for staff, students and visitors	Until superseded by new materials + 5 years	Destroy
	9.1.5 General risk assessments of health and safety hazards	Until superseded by updated risk assessment + 5 years	Destroy
9.2	HAZARDOUS SUBSTANCES		
	9.2.1 Risk assessments involving hazardous substances	Held in perpetuity	N/A
	9.2.2 Health and safety instruction and training records for employees exposed to hazardous substances (see 6.2.5-6.2.6 for records relating to general staff training and development programmes)	End of employment + 40 years	Destroy
	9.2.3 Records concerning work with asbestos	Held in perpetuity	N/A
	9.2.4 Records concerning work with radioactive and other hazardous substances	Held in perpetuity	N/A
	9.2.5 Formal investigations and reports into injuries, dangerous occurrences, accidents, incidents involving hazardous substances, environmental incidents and outbreaks of notifiable diseases on Company premises	Closure of investigation + 40 years	Destroy

	9.2.6 Official notifications as required of injuries, dangerous occurrences, accidents, incidents involving hazardous substances, environmental incidents and outbreaks of notifiable diseases on Company premises	Date of notification + 6 years	Destroy
	9.2.7 Records relating to disposal of general waste	Disposal of waste + 2 years	Destroy
	9.2.8 Records relating to disposal of hazardous and clinical waste	Disposal of waste + 6 years	Destroy
9.3	FIRE SAFETY AND FIRST AID		
	9.3.1 Records detailing the appointment of fire wardens and first aiders	End of an individual's appointment + 5 years	Destroy
	9.3.2 Fire safety risk assessment and drill procedures	Until superseded by updated risk assessment or new procedures + 5 years	Destroy
	9.3.3 Fire fighting and safety equipment testing	Until re-tested + 5 years	Destroy
	9.3.4 Assessments of first aid facilities, equipment and personnel	Until superseded by updated assessment + 3 years	Destroy
	9.3.5 Arrangements between the Company and the emergency services in the case of fire or medical emergency	Until superseded by new arrangements + 5 years	Destroy
9.4	OCCUPATIONAL HEALTH		
	9.4.1 Occupational Health records (throughout employment) for employees exposed to hazardous substances	End of employment + 40 years	Destroy
	9.4.2 Occupational Health records (throughout employment) for all other employees	End of employment + 8 years	Destroy
9.5	SECURITY		
	9.5.1 Security incident reports and logs	Last action on incident + 3 years (though longer periods may be necessary for evidential purposes)	Destroy
	9.5.2 CCTV images and other routine surveillance system records	Date of surveillance + 1 month (though longer periods may be necessary for	Destroy

		evidential purposes or for particular systems)	
	9.5.3 Building access logs	Date of log + 2 years	Destroy