

Document Title	Code of Practice 6: Retention and disposal of records and data
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Relevant to	All academic and professional services staff

All staff should be aware that there are retention periods for all records, data and information held by the University.

1. Information & Records Retention Schedules

- Information & Records Retention Schedules for each Faculty, Directorate or area of the University should be referred to for retention periods
 - If a record, data or information is kept by you that is not listed on a schedule, contact your Records Coordinator or the Information Compliance Manager
- Staff listed (by job title) on schedules as “Keeper” are responsible for keeping and managing those records listed, and for disposing of them
- All of the following should be listed on schedules:
 - A record of a transaction of a business or administrative process
 - A record which is evidence of a business or administrative activity
 - An historical record of continuing importance to the University or wider community
 - Any data kept to comply with a legal or statutory requirement
 - Any data kept to comply with good practice requirements
- The following need not be listed on schedules:
 - Ephemeral or transitory records e.g. hand-written scribbles on pads or post-its; email messages which don't need to be kept; written or typed notes which have been transferred to a more formal document
 - Personal copies, the formal or original copy of which is held elsewhere under somebody else's responsibility (although good practice should be followed if keeping this type of data)
 - Publications or brochures received from outside the University

2. Staff, financial, health and safety records held locally

- If you have staff records or financial records, or health and safety records, which you hold locally, refer to Locally held codes of practice here: <https://www.gre.ac.uk/about-us/governance/information-compliance/keeping-and-processing-information/codes-of-practice> in particular regarding Finance records and Staff records.

3. Disposing of Records, Data and Information

- Retention Schedule periods should be adhered to – records and data should be disposed of at the correct time

- Records and data should not be disposed of if they are the subject of a current or pending enquiry, which may be under the Freedom of Information Act, Data Protection Act, or other enquiry including internal investigations
- Methods of disposal should be appropriate to the required security or sensitivity needs of the record, data or information
 - Refer to the Data Classification Policy and information handling procedures for levels of sensitivity
 - Personal, confidential or sensitive records or data should have a destruction method which is irreversible: in other words, there is no reasonable risk that they can be recovered
 - Shred paper records or dispose of them using the confidential waste method offered by Estates & Facilities via their helpdesk.
 - Electronic records – after deletion, empty recycle bins and deleted items folders. Items which are backed up to server will be deleted or overwritten by ILS after a specified period of time
 - Refer to the Disposal of IT Equipment Policy for further information.
 - Non-sensitive or open records and data can simply be deleted or placed in recycling bins
- Keep a log recording details of disposal, if that disposal was outside the timescale of the Retention Schedule.

4. Working documents

- These are documents which you have produced for your own use, and you may have kept them for some length of time.
- If you no longer need or refer to them, dispose of them securely.
 - Do not dispose of records which are listed on retention schedules and which have not yet reached the end of their retention period. Refer to Records Coordinators for advice.

5. Outside contractors or agencies

Any contractor used for disposal services should:

- Be recommended by Procurement Services
- Be registered with the Information Commissioner's Office if personal data is involved
- Provide sealable bags or containers for local collection of data over a period of time with final collection by the contractor at a specific time or when collection units are full
- Be able to provide a fully documented audit trail of your consignment from initial receipt until final destination
- Hold valid Environmental Agency Licences for the transport and management of waste appropriate to disposal needs
- Have lockable, sealed, and alarmed vehicles if left unattended
- Ensure that destruction takes place within a short period of time after the instruction
- Provide a contract
- Provide a certificate of destruction.

Refer to the Disposal of IT Equipment Policy for further information.