

Records Retention Policy

1. Introduction and values

- 1.1. Queen Mary University of London (Queen Mary, the University) requires principles and a framework for ensuring that it implements effective records management, accounting for legislative, regulatory and best-practice provisions.
- 1.2. The purpose of this policy (and associated retention schedule and procedures) is to promote standards in records management in order to protect the interests and support the core functions of Queen Mary 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.
- 1.3. Queen Mary 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 and comply with other information rights legislations.
- 1.4. Records, as defined in paragraph 2.1, are a vital asset required by the University 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 from creation through to disposition is therefore imperative and Queen Mary recognises the importance of this activity.

2. Definitions

- 2.1. **Records** are defined as 'information created, received and maintained as evidence and as an asset by an organization or person, in pursuit of legal obligations or in the transaction of business' (ISO 15489-1:2016 s.3.14).
- 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 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 should include the starting point for its calculation, the length of time and what action should be taken when the period expires. The Queen Mary 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.

3. Legislative context

- 3.1. Some records are required by legislation to be retained. The following legislation may be relevant in determining retention periods and guidelines for the University:
 - 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

4. Scope

- 4.1. This policy relates to all records, regardless of their form or the system in which they are captured, created, received or maintained, belonging to Queen Mary and applies throughout the University, including, where appropriate, its subsidiaries and partner organisations, such as third-party service providers who are contractually obliged to maintain records on the University's behalf.
- 4.2. All staff must comply regardless of School, Institute, Directorate or other department. Compliance with this Policy is mandatory and disciplinary action may be taken against any member of staff who fails to do so.

5. Principles

- 5.1. Records that are created or received and maintained by Queen Mary employees - and those working for QMUL as contractors, volunteers or in partner organisations - in the course of their business activities and research for Queen Mary, are deemed to be records belonging to Queen Mary. This applies whether or not the records are held on University premises.
- 5.2. 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.
- 5.3. 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.
- 5.4. 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, for example to ensure accessibility and security.
- 5.5. 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 must be preserved in Queen Mary's historical archives facilities.
- 5.6. Retention periods 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.
- 5.7. 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 or sector sources.

- 5.8. 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.
- 5.9. 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.
- 5.10. 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. Records must be retained and disposed of in compliance with the Records Retention Schedule.

6. Roles and responsibilities

- 6.1. The 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.
- 6.2. 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 must be done in compliance with the 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.
- 6.3. 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.
- 6.4. Within each department a specific person should be responsible for managing the consistent implementation of this 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.

- 6.5. Employees who are responsible for authorising the destruction of time-expired records must respond to review requests promptly.
- 6.6. The Archives is responsible for the selection of records for permanent preservation and the maintenance of the archives of Queen Mary and its predecessor entities.

7. Policy detail

- 7.1. This policy is formed of two parts: this document sets out the general principles and responsibilities across Queen Mary, while the Records Retention Schedule, as defined in paragraph 2.4, sets out the length of time the University's records should be retained.

8. Associated information

- 8.1. This policy should be read in conjunction with the procedures and guidance published by the Directorate of Governance and Legal Services relating to information governance.

9. Review

- 9.1. This policy will be reviewed at least every three years.
- 9.2. Minor updates to this policy that do not affect the rules, principles or intent of this policy may be approved by the Records & Information Compliance Manager on behalf of the Information Governance Group.

Policy Information and Document Control

Policy title	Records Retention Policy
Version number	v1.5
Related policies and procedures	<p>This is a non-exhaustive list of other policies which may be amended, revised, replaced and supplemented and additional relevant policies created from time to time.</p> <ul style="list-style-type: none"> • Data Protection Policy • Freedom of Information procedure • Information Security Policies • Intellectual Property Policy • Barts Health NHS Trust equivalent policies
Superseded policies	N/A.
Approval level	Information Governance Group
Approval date	16/07/2025
Effective date	From approval date
Next review due	June 2028
Policy owner	Paul Smallcombe, Records & Information Compliance Manager
Policy contact	Information Governance Team

Version Control

Version	Date	Reason for updates/Summary of key changes
1.5	16/07/2025	<i>Transfer to new template</i>

Appendix – 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. forms 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, POs, 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, prospectuses
- 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
- Systems of record and 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 and NAS devices