

RECORDS MANAGEMENT POLICY

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1. Introduction

1.1 Bath Spa University generates academic and non-academic records about its staff, students and business. In order to operate effectively and efficiently, some of these records are stored and retained. The University is committed to managing these records in accordance with a clear and open policy.

1.2 Whilst the University recognises that a controlled process for the creation, management, storage and eventual destruction of records can bring certain administrative and financial benefits, it also assists to discharge legal obligations, particularly those created by the Data Protection Act and Freedom of Information Act. The University is also subject to regulatory and accountancy rules concerning the creation and retention of particular records.

1.3 All University staff members must ensure they are familiar with the content of this policy. The policy sets out the minimum expected standards of practice required in the management of the University's corporate records.

1.4 Within this policy, 'records' includes information obtained by the University in a variety of formats. This includes both electronic and hard copies. It will include emails, paper, digital, social media, videos and telephone messages. All documents will be considered records for purposes of this policy.

2. Aims

2.1 The implementation of this policy is intended to assist the University in compliance with various legal obligations including those contained within:-

- Data Protection Act 1998
- Freedom of Information Act 2000
- Regulation of Investigatory Powers Act 2000

2.2 The policy will raise awareness among staff members of records management and ensure that information and records the University is legally required to create and maintain, can be accessed easily by those who need to see it.

2.3 Once a record has been created, this policy will provide guidance on the secure maintenance of the record and the provision of access to it for as long as it is required.

2.4 In addition to ensuring that records are kept for as long as they are required, the policy will provide a framework for ensuring that records are kept only for as long as they are required. Once the record is no longer required, this policy provides guidance on confidential destruction.

3. Implementation

3.1 The University Solicitor (also the Data Protection Officer) is responsible for the maintenance of this policy, which applies to the University as a whole. Appended to this policy is a records retention schedule, which provides a non-exhaustive list of the types of records the University routinely creates and the associated minimum retention period.

3.2 Responsibility for implementing the policy (including adhering to the records retention schedule) rests with Deans, Heads of Departments and Heads of Professional Services. Overall responsibility for records management across the institution rests with the Vice-Chancellor.

3.3 All staff members are responsible for ensuring that records they create adhere to this policy. In particular, they must ensure that records are stored on the most appropriate medium, only created where necessary, stored securely and in a means by which they are easily accessible in the future, periodically reviewed and confidentially destroyed when no longer required.

3.4 Each department or service is responsible for nominating a person to be responsible for the implementation of this policy in their team.

4. Creation

4.1 As noted in paragraph 1.4 above, the term "records" includes a wide variety of information stored, gathered or created by the University. A large proportion of the records created by staff of the University may have little long term use or benefit to the University and can be destroyed as soon as they no longer hold any operational, informational or evidential value to the University.

4.2 All records are potentially subject to requests under the Freedom of Information Act. This policy is intended to assist University staff to determine which records must be retained to comply with various obligations including those under the Freedom of Information Act, however, staff should be mindful that any record they create or retain is potentially subject to such a request. Whilst the appended retention schedule is non-exhaustive, staff should exercise care before retaining any additional records.

4.3 Copies and duplicates of an original record do not need to be retained. This policy and the appended retention schedule apply to the original master copy of the relevant record.

4.4 Staff are responsible for developing systems to retain records in accordance with this policy and the appended retention schedule. Records must be managed to allow for efficient access and retrieval. It is intended that the implementation of this policy will enhance collaborative working and knowledge exchange.

- 4.5 It is recommended that records are stored electronically wherever possible. This will assist to reduce the costs of storage and aid easy access and retrieval. Stored records should ideally be indexed. Indexed electronic records should be retained in shared drives on the University server. Records should **not** be stored outside of the University's computer systems, for example, on Google Drive; or on local drives of desktop or laptop computers.
- 4.6 The University does not have a central storage facility for paper records. If staff wish to keep records in paper format, appropriate secure storage must be sourced and maintained for the relevant retention period. Paper records must be appropriately secured against damage, for example, by fire or water.
5. Destruction
- 5.1 The records retention schedule appended to this policy specifies a minimum retention period. On expiry of the relevant retention period, the person responsible for the record must review it and determine the next step.
- 5.2 The content of the record should be considered for ongoing value to the University. For example, if the original record related to a research grant and the retention period was set according to the original grant, has there been any subsequent extension of that grant or a related project that might warrant a longer retention period?
- 5.3 Where the relevant record contains an individual's personal data, care must be taken when extending any retention period. The general rule is that personal data should be kept only for as long as specified in the retention schedule.
- 5.4 Some records may be suitable for permanent retention in the University's archive. The retention schedule identifies some records that will be retained permanently. However, staff should consider whether any record holds archival value before destroying it.
- 5.5 Once a decision has been made to destroy a record, it must be destroyed securely and confidentially. In some parts of the University's premises, confidential waste bins are provided. In other cases, confidential waste sacks can be requested from Domestic and Portering Services. University staff should note that any hard copy documents placed in general recycling bins will not be destroyed securely and University records should not therefore be disposed of using recycling bins.
- 5.6 Records must not be destroyed in response to requests under either the Data Protection Act or the Freedom of Information Act. It can be a personal criminal offence for University staff to destroy information requested under either of these Acts.
6. Review
- 6.1 The University Solicitor will review this policy at least every three years and will update as appropriate to comply with developments in legislation or good practice relevant to the sector.

RECORDS RETENTION SCHEDULE

No.	Record Group	Examples	Retention Period	Authority
1	Learning & Teaching			
2	Research Office			
2.1	Records documenting funding from an external body	Applications, awards and associated documents	Completion of project + 10 years	JISC
2.2	Records documenting the administration of funding allocations from statutory bodies	Applications, awards and associated documents	Current financial year + 10 years	N/A
2.3	Records documenting applications for research funding that were unsuccessful	Applications and associated documents	Date of notification of decision + 1 year	JISC
2.4	Records documenting applications for research funding that were not submitted	Applications and associated documents	Date of decision not to submit + 1 year	N/A
2.5	Records documenting funding made available through the ERDF	Applications, awards and associated documents	Completion of project + 25 years	Article 90 of EC regulation 1083/2006
2.6	Records documenting funding through Horizon 2020	Applications, awards and associated documents	Completion of project + 5 years	Horizon 2020 model contract
2.7	Records documenting research strategy	Working papers, strategy documents, policies and associated documents	Superseded + 10 years	JISC
2.8	Research publications	Papers, journals, articles	Publication + 3 years	JISC
2.9	Research conduct	Case files, investigatory reports, correspondence and supporting documents.	Closure of case 6 years	N/A
2.10	Performance records	Statutory and other returns including HE-BCI and REF; evidence of ethical approval and quality assurance	Date of record + 10 years	N/A

3	Registry & Student Support			
4	Estate Management			
5	Finance			
5.1	Financial Accounting			
5.1.1	Finance strategy development and management planning	Strategy documents, working papers, evidence to support lead indicators	10 years	JISC
5.1.2	Finance Regulations	Financial regulations, code of conduct, finance policies	Superseded + 10 years	JISC
5.1.3	Annual accounts		6 years	1970 c 9 s 34 1980 c 58 ss 2, 5
5.1.4	Assets	Asset register, evidence of approval to dispose of assets	6 years	1970 c 9 s 34 1980 c 58 ss 2, 5 1994 c 23 s 77(1)
5.1.5	Management accounting	Monitoring income and expenditure against annual operating budgets, action to deal with variances, analyses of internal deployment of financial resources	1 year	JISC
5.1.6	Budgeting	Annual operating budget	1 year	JISC
5.1.7	Returns	Tax returns, VAT accounting, associated preparatory documents	6 years	1970 c 9 s 34 1994 c 23 Sch 11 para 6(3)
5.1.8	Banking	Statements, standing orders, direct debit mandates, paying-in and withdrawal slips	6 years	1970 c 9 s 34 1980 c 58 ss 2, 5
5.1.9	Purchases and receipts	Invoices, credit notes, income and expenditure batches, receipts, BACS reports, till rolls, petty cash records, fees for tuition and income	6 years	1970 c 9 s 34 1980 c 58 ss 2, 5 1994 c 23 s 77(1) HMRC VAT Notice 700/21 para 2.4
5.1.10	Expenses	Claim forms, receipts and remittance advice notes	6 years	1970 c 9 s 34 1980 c 58 ss 2, 5
5.2	Payroll and pension administration			

5.2.1	Calculation and payment of individual salaries and other payments and deductions	Contract copies and variations, union subscriptions, payroll giving forms and gift aid	6 years	1980 c 58 s 5
5.2.2	Employer PAYE records required to be kept for inspection	Wage slips, records of payments and deductions	3 years	SI 2001/1004 Sch 4 paras 7(15), 26(1)(a) SI 2003/2682 reg 97(8)
5.2.3	Pension scheme contributions	Annual returns, application forms, expression of wish forms, opt-out forms	End of employment + 75 years	1980 c 58 s 32
5.3	Student finance			
5.3.1	Student loans	Applicant details provided by Student Finance England, in year information and programme	6 years	1980 c 58 s 5
5.3.2	Applications for hardship fund / bursaries	Correspondence, applications, evidence of financial means, decision notice, minutes of decision-making body, annual spreadsheet of allocated funds	6 years	1980 c 58 s 5
5.3.3	Unsuccessful applications for financial assistance		6 months	N/A
5.4	Procurement			
5.4.1	Contract tendering – evaluation of prospective suppliers	Pre-qualification questionnaires and scores	Award of contract + 1 year	JISC
5.4.2	Contract tendering – invitation to tender stage	ITT, specifications, award criteria, tenders and quotations	End of contract + 6 years	1980 c 58 s 5
5.4.3	Evaluation of tenders and negotiations with prospective suppliers – successful bids	Evaluation scores, award letters, form of contract, OJEU Contract Award Notices	End of contract + 6 years	1980 c 58 s 5
5.4.4	Evaluation of tenders and negotiations with prospective suppliers – unsuccessful bids	Evaluation scores and correspondence	Award of contract + 1 year	JISC
5.4.5	Supply contract management	Contract variations and performance monitoring	End of contract + 6 years	1980 c 58 s 5 HMRC VAT Notice 700/21 para 2.4

5.4.6	Summary records required under SI 2006/5 reg 32(14)	Summary of contracts awarded	Termination of contract + 10 years	1980 c 58 s 5
5.4.7	Records required under SI 2006/5 reg 40	Statistical reports sent to the Cabinet Office	3 years	JISC
5.4.8	Supplier approval	Supplier database	While current	JISC
5.4.9	Purchasing	Purchase orders and Goods Received Notes	Current financial year + 6 years	1980 c 58 s 5 HMRC VAT Notice 700/21 para 2.4
5.5	Insurance			
5.5.1	Employer's liability insurance certificates	The insurance certificate	Expiry of policy + 40 years	SI 1998/573 reg 4(4)
5.5.2	All other insurances	Renewals, policy documents, schedules	Expiry of policy + 6 years	1980 c 58 s 5
5.5.3	Insurance claims	Records documenting claims received and outcomes	Settlement/withdrawal of claim + 6 years	1980 c 58 s 5
6	Human Resources			
7	IT Services & Library			
7.1	IT Services			
7.1.1	Software Licenses	Licenses for server, desktop, mobile and SaaS software products	License/Contract Expiry + 6 years	1980 c 58 s 5
7.1.2	Warranty Documents	Hardware Device warranty and guarantee documents	Warranty Expiry + 3 years	
7.1.3	Maintenance, Support and Managed Service Contracts	Contracts for technology services managed and/or supported by third parties	End of contract + 6 years	1980 c 58 s 5
7.1.4	IT Asset Register	Asset information	Asset disposal + 6 years	1980 c 58 s 5
7.1.5	IT Service Management Records	Records of incidents, change requests, service requests	Record closure + 3 years	
7.1.6	IT security Investigation reports	Reports into incidents related to the security of data or information	10 years	
7.1.7	IT misuse/abuse investigation reports	Reports into the misuse of IT or breaches of IT policies	10 years	
7.1.8	Phone and data usage bills	Mobile telephony bills	Current financial year + 6 years	1980 c 58 s 5

7.1.9	User Survey data	Raw data for surveys of IT performance	Completion of analysis + 6 months	
7.1.10	Technical designs, plans and schematics	Technical and architectural plans, designs and schematics for IT systems and fitouts	Superseded + 2 years	
7.1.11	IT Strategy		Superseded + 2 years	
7.1.12	KPI & Metrics	KPIs on IT performance	10 years	
7.1.13	Service Level Agreements	Internal SLAs with customer departments	Superseded + 2 years	
7.1.14	IT Software Escrow Agreements	Escrow relating to software source code	End of contract + 6 years	1980 c 58 s 5
8	Corporate Affairs			
9	Marketing & Communications			
9.1	PR/Communications			
9.1.1	Developing public relations/media plan	PR/media plan and associated working papers	Issue of plan + 1 year	JISC
9.1.2	Procedures for reviewing policies/guidelines	Records documenting review processes	Issue of procedures + 1 year	JISC
9.1.3	Managing BSU's communications with the public, including handling public complaints and suggestions	Records of enquiries and responses	Last action on feedback/complaint + 1 year	JISC
9.1.4	Media relations management	Records of media contacts	Superseded + 1 year	N/A
9.1.5	Media relations management	Media relations policy/procedures working papers	Issue of policy/procedures + 1 year	JISC
9.1.6	Media communications	Press releases	Creation + 10 years	N/A
9.1.7	Media communications	Handling media enquiries/arranging responses	Last action + 3 years	JISC
9.1.8	Media monitoring	Press cuttings	Creation + 3 years	N/A
9.1.9	Media monitoring	Recording and transcripts of media briefings and interviews	5 years	JISC
9.2	Marketing			
9.2.1	Market research	Records showing design & development of market research	Completion + 5 years	JISC

9.2.2	Market research	Analysis reports	Completion + 5 years	JISC
9.2.3	Marketing plan	Marketing plan and associated working papers	Issue of plan + 1 year	JISC
9.2.4	Marketing campaigns	Records relating to campaign planning, design and review	Completion of campaign + 3 years	JISC
9.2.5	Corporate identity and brand management	Records relating to corporate identity design	Superseded	JISC
9.2.6	Corporate identity and brand management	Records related to corporate style guides and official use of brand collateral	Superseded	JISC
9.2.7	Advertising management	Records relating to design and implementation of advertising campaigns	Current + 5 years	JISC
9.2.8	Promotional materials	Records relating to design of promotional materials including prospectus	Superseded + 1 year	JISC
9.2.9	Promotional materials	Copies of prospectus	Permanent retention in university archives	N/A
9.2.10	Events management – student recruitment events	Records of planning events including all event management activities	Completion of event + 1 year	JISC
9.2.11	Events management – student recruitment events	Bookings and registration lists	Completion of event + 3 years	JISC
9.2.12	Events management – student recruitment events	Reporting & evaluations	Completion of event + 3 years	JISC
9.2.13	Events management – student recruitment events	Student ambassador records	Completion of casual contract + 3 years	N/A
9.2.14	Student recruitment	Pre-enrolment enquirer data capture including prospectus requests, 'Send me updates' sign-ups	3 years	N/A
9.3	Widening Participation ("WP")			
9.3.1	Monitoring and evaluation of WP activity	WP profile data from first contact to enrolment and beyond	Until subject reaches age of 25	N/A
9.3.2	Monitoring and evaluation of WP activity	External HEFCE/OFFA monitoring returns	Superseded + 1 year	N/A

9.3.3	Monitoring and evaluation of WP activity	Internal evaluation reports	Completion + 10 years	N/A
9.3.4	Delivery of WP initiatives	Student ambassador records	Completion of casual contract + 3 years	N/A
10	Fundraising & Alumni Relations			
10.1	Donor, Alumni and/or Honorary Graduates records, documents, correspondence, donations	Personal details of individuals	Current + 5 years	JISC
10.2	Summary (anonymised) statistical records	Statistical information, amounts of donations received against funds / campaigns (with associated personal data deleted)	Permanent	N/A
10.3	Fundraising and Alumni strategy, policies and procedures	Finalised strategy, policies, procedures, and associated working documents and any external tenders	Superseded + 2 years	JISC
10.4	Fundraising and Alumni communications and promotional materials	Records documenting the commissioning, design, planning and production of official alumni communications and fundraising campaigns	Issue of communication + 1 year	JISC
10.5	Fundraising and Alumni communications and promotional materials	SPARTAN Magazine, online profiles, campaign materials	A permanent copy can be retained in BSU archive, Alumni Office and Library as contributors have consented	N/A
10.6	Alumni survey	Records documenting the commissioning, design, planning and production of the alumni survey	Issue of communication + 1 year	JISC
10.7	Alumni survey	Individual responses – raw data	Completion of analysis + 6 months	N/A
10.8	Alumni survey	Statistical and analytical data	Completion + 5 years	N/A
10.9	Donor and Alumni enquiries and feedback	Emails, correspondence, actions taken after calls, contact reports after meetings	Current + 5 years	JISC
10.10	Donor and Alumni complaints	Emails, correspondence,	Last action on complaint + 3 years	JISC

		actions taken after, official reports in line with BSU complaints procedure		
10.11	Donor and Alumni events e.g. networking, reunions, galas, receptions	Invitation and attendance guest lists, ticketing	Current + 5 years	JISC
10.12	Donor and Alumni events	Records documenting the commissioning, design, planning and production of alumni events	Completion of event + 1 year	JISC
10.13	Requests to contact alumni	Fellow alumni 'keep in touch' requests	Current + 5 years	N/A
10.14	Requests to contact alumni	Request to contact alumni from inside BSU. <i>NB we do not provide data to third parties</i>	Last action on request + 1 year	JISC
10.15	Researching prominent graduates and potential donors	Profiles created using freely available information for case studies and to identify potential donors; lists of prospect donors – individuals, businesses, grant makers, alumni	Completion of research + 2 years	N/A
10.16	Honorary graduates	List of all recipients of honorary awards	Permanent	N/A
10.17	Allocating scholarships, grants, bursaries and prizes	Records generated by assessment of applications, including student proposals, applications, correspondence, committee minutes and outcome letter.	Completion + 6 years	JISC
10.18	Impact report	Student grant recipient and donor feedback on the impact of the philanthropy received	A permanent copy can be retained in BSU archive and Fundraising Office as contributors have consented	N/A
10.19	Donations	Enquiries about donations, gift aid declarations, donations received	Current + 7 years	Gift Aid
11	Legal Services			
11.1	Contracts executed under seal	Contracts, Deeds, Agreements and Memoranda	Termination of contract + 12 years	1980 c. 58 s 8

		together with records of the negotiation of the same		
11.2	Contracts executed under hand	Contracts, Agreements and Memoranda together with records of the negotiation of the same	Termination of contract + 6 years	1980 c. 58 s 5
11.3	Legal claims	Records documenting legal support or advice provided in response to claims by or against BSU	Withdrawal or settlement of claim + 6 years	1980 c. 58 ss 2 and 5
11.4	Legal advice provided on all other matters	Correspondence, advice notes, papers.	Superseded + 5 years	JISC
11.5	Minutes of board meetings of Bath Spa U Limited	Minutes	10 years from the date of the meeting	2006 c. 46 s248(2)