Retention Schedule for records produced by Governance activities

A procedure under the Information Governance and Records Management Policy

HERIOT-WATT UNIVERSITY
Records Retention Schedule: Information Governance and Records Management Policy

CONTENTS

1. INTRODUCTION

1.1   The [Information Governance and Records Management Policy](#) ('the Policy') sets out the information governance principles the University applies to be accountable for, and transparent about, its activities. The University's retention schedules support the implementation of the information governance principle:

We create, receive, and maintain information assets that have a defined Lifecycle

1.2   The University's retention schedules set out how long it is necessary to retain information. They help to ensure that we retain information for as long as it is needed for business, legal or regulatory purposes, but no longer. This is necessary to comply with legislation, regulations, audit requirements and good practice.

1.3   The University's retention schedules are linked to the Jisc business classification scheme, which provides sector-wide guidance for describing and classifying the functions and activities of higher education institutions. Retention periods are based on the function and activity that produced the information rather than the format or content, and (where applicable) are based on record retention recommendations made by Jisc.

1.4   Once the University's information assets reach the end of their defined lifecycles, they must be disposed of appropriately. This is known as 'disposition' (see definitions below).

1.5   Heriot-Watt University retention schedules are 'procedures' of the Information Governance and Records Management Policy as they support implementation of the Policy.

2. SCOPE

2.1   Our retention schedules set out the lifecycles for university records that are the 'lead copy', sometimes also known as the 'master copy', 'golden copy' or 'single point of truth'. All other copies are reference copies and have only temporary value. Reference copies should be disposed of as soon as they are no longer needed for reference.

2.2   The retention schedules do not apply to 'transitory information' (see definitions below).

3. HOW TO USE THE UNIVERSITY'S RETENTION SCHEDULES

3.1   Retention periods are based on the function and activity which produced the information rather than format or content.

3.2   **Functions** are *what* an organisation does. They are the major responsibilities that are managed by an organisation to fulfil its mission or mandate, and its responsibilities to stakeholders.

3.3 **Activities** are *how* an organisation does what it does. They are the major tasks carried out by an organisation to accomplish each of its functions. Activities are made up of tasks and transactions which are performed to accomplish each function. Activities may be routine or creative. Routine activities follow agreed rules and standard procedures, e.g. handling a complaint or an academic appeal. Creative activities do not follow a regular pattern, e.g. writing an academic paper.

3.4 While some functions and activities have the same or similar names as organisational departments, they are not the same thing. For example, the University has a Health and Safety team which sets H&S policy and carries out organisational-wide risk assessments. But every organisational unit within the University, and every member of staff has some responsibility for H&S activities, e.g. reporting incidents and potential incidents.

3.5 The University's functions and activities are listed in the University's business classification scheme (BCS) available on the Information Governance Intranet site. University staff can browse or search the BCS and find detailed definitions of each function and activity.

3.6 To identify the retention period for a particular activity, identify which function created the record (a list of functions and their definitions is available by selecting the 'Functions List' view of the BCS) and go to the retention schedule of the same name.

3.7 On the retention schedule for the relevant function, look for the activity that produced the records. Detailed descriptions of each activity are provided in the BCS. Then review the record descriptions to find the row that most closely matches the records.

3.8 Each record description has a retention period. Each retention period comprises:

- A disposition action
- A period of time
- A trigger event

3.9 The 'disposition action' is either:

- 'Destroy' (often shortened to 'D') or
- 'Archive' (often shortened to 'A').

'Destroy' means that the records must be destroyed by following the Records Destruction Procedures. 'Archive' means that the records should be offered to the University Museum and Archive for permanent preservation for future generations by following the Archive Transfer Procedure [in development].

3.10 The retention period is usually expressed as a period of years or months. This is the minimum period for which the records must be retained after the trigger event has occurred.

3.11 The 'trigger event' is the point from which the retention period is calculated. Common trigger events include:

- End of the academic year in which the records were produced. This is often shortened to **'CAY'**
- End of the financial year in which the records were produced. This is often shortened to **'CFY'**
- The point at which the record has been superseded by a new version, for example the point when the new version of a policy comes into effect. This is often shortened to **'superseded'**
- The point at which a case (e.g. an academic appeal case, a complaint case, an enquiry) is closed and no further action is taken on it. This is often shortened to **'case closure'**
- The point at which a student permanently leaves the University because they have graduated, permanently withdrawn from study, or for some other reason. This is often shortened to **'end of relationship'**

3.12   Where appropriate each retention period includes the 'authority' for the retention period. The 'authority' is the source of the retention period. The authorities used by the University's retention periods are primarily:

- Statutory or regulatory requirements (e.g. Prescription and Limitation (Scotland) Act 1973 c.52 s6)
- The relevant version of the Jisc Records Retention Management guidance (e.g. 'Jisc RRS 2019')
- 'Institutional business requirements' (i.e. the length of time needed to meet Heriot-Watt University business requirements)

4.   RELATED POLICIES AND PROCEDURES AND FURTHER REFERENCE

4.1   Each retention schedule should be read in conjunction with:

- [Information Governance and Records Management Policy](#)
- [Records Destruction Procedures](#)
- Archive Transfer Procedures [in development]
- The University's other [retention schedules](#)
- The University's Business Classification Scheme (available on the Information Governance intranet)

4.2   Sector-wide records retention guidance is available from Jisc at: https://www.jisc.ac.uk/guides/records-retention-management

5.   FURTHER HELP AND ADVICE

For further information and advice about this retention schedule, contact

5.1   Anne Grzybowski
Records Manager
Information Governance Division
Governance and Legal Services
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6. DEFINITIONS

Archival value

Long-term research value for cultural purposes. Probably less than five per cent of university records have archival value and need to be preserved permanently in the Heriot-Watt University Museum and Archive. University records with archival value are those which reflect and provide the essential evidence of the University's most significant functions and activities, and also serve legitimate research needs of the University and wider academic and public user community. University records with archival value collectively show how the University was organised and operated, its effect on the wider community and what it did and why.

Disposition

Processes associated with implementing records retention, destruction or archival transfer decisions which are documented in retention schedules.

Disposition action

What happens to a record at the end of its retention period. The disposition action for records that have archival value is 'transfer to archive'. The disposition action for all other records is 'destroy'.

Disposition authority

The instrument that defines the disposition actions that are authorised for specified records. For the University our disposition authorities are the retention schedules approved by the Global Information Governance and Data Protection Committee.

Information asset

An information asset may comprise a combination of data, electronic or paper documents, still or moving images, objects, hardware, and software that together support a university activity. The term is broad. The National Archives defines an information asset as: "a body of information, defined and managed as a single unit so it can be understood, shared, protected and exploited efficiently. Information assets have recognisable and manageable value, risk, content and lifecycles."

Record

Recorded information or data (in any format) created, received, or maintained by the University (or someone working or acting on its behalf) in the transaction of university business or conduct of university affairs and kept as evidence of those activities for business, regulatory, legal or accountability purposes.

'Business purposes' are any purposes which support the University's functions and activities. 'Regulatory

purposes' are any purposes which support or demonstrate the University's compliance with regulatory requirements. 'Legal purposes' are any purposes which support or demonstrate the University's compliance with any legal obligation. 'Accountability purposes' are any purposes whereby the University answers for its conduct.

Retention schedule   Sets out the agreed length of time the University needs to keep different types of records. Retention schedules are policy documents which support compliance with legislative and regulatory requirements.

The University's retention schedules are available at: University Retention Schedules.

Transitory information   Has only temporary value. It is produced:

- In the completion of routine actions (ephemeral records)
- In the preparation of other records which supersede them (temporary records)
- For convenience of reference (reference copies)

Transitory information has no significant informational or evidential value after it has served its primary purpose. It can usually be disposed of within no more than 6 months.

Trigger event   The event from which a retention period is calculated.

6. PROCEDURE VERSION AND HISTORY

Date	Author	Brief Description of Amendment
Oct 2010	Brian D.A. Kelvin, Records Manager	Previously approved version of the retention schedule for governance records.
Feb 2025	Anne Grzybowski, Records Manager	Revised to provide greater clarity concerning which committees' records should be transferred to the University Archive for permanent preservation.

APPENDIX 1: RECORDS PRODUCED BY GOVERNANCE ACTIVITIES

Scope of this retention schedule

'Governance' is the function of developing and establishing the institution's corporate governance structure and rules, and of conducting its business in accordance with its governance structure and rules.

BCS	Record Description (Jisc)	Record Description (HWU)	Disposition Action	Retention period			Trigger event	Notes	Authority	Responsible Org Unit
Governance Strategy Development	Key records documenting the development and establishment of the institution's governance strategy.	Assurance mapping or reviews undertaken against external legislation and best practice.	Archive	10	years	after	Superseded	Transfer records to the University Archive for permanent preservation 2 years after creation. Reference copies may be retained by the responsible organisational unit.	Jisc RRS 2007	Policy and Governance, GaLS
	Working papers documenting the development and establishment of the institution's governance strategy.	Notes and drafts of assurance mapping or reviews undertaken against external legislation and best practice.	Destroy	1	year	after	Issue of strategy		Jisc RRS 2007	Policy and Governance, GaLS
Statutory Committee Administration	Records documenting the development and establishment of the terms of reference, and the rules and procedures, for a statutory committee. (Note from the Scottish Code of Good Higher Education Governance 2023: At a minimum, the governing body's committees must include a nominations committee, an audit committee, and a remuneration committee, or equivalents.'	Records relating to: Court; Senate; University Executive; Global Operations Executive; Fees, Scholarships and Abatements Committee; any standing committee or group which reports directly to Court; standing committees of Senate which do not primarily make decisions in relation to individuals (including: Senate Committee for Interim Business and Effectiveness; University Committee for Learning & Teaching; University Committee for Quality and Standards; University Committee for Research & Innovation).	Archive	0	months	after	End of life of institution	Transfer records to the University Archive for permanent preservation 2 years after creation. Reference copies may be retained by the responsible organisational unit	Jisc RRS 2007	Policy and Governance, GaLS
	Records documenting the conduct of business of a statutory committee: agenda, minutes and supporting papers.	Refer to the University Committee Structure chart published on the University website at https://www.hw.ac.uk/uk/about/profile/governance.htm	Archive	0	months	after	End of life of institution	Transfer records to the University Archive for permanent preservation 2 years after creation. Reference copies may be retained by the responsible organisational unit	Jisc RRS 2007	Policy and Governance, GaLS
	Records documenting the appointment / election / designation of members of a statutory committee (successful candidates)	Including application (such as CV and covering letter), interview invitation / schedule (to demonstrate process followed), personal statement (for election), election results summary, communications to University regarding successful election, formal appointment letter, any personal information collected as part of the member's committee role. The advert and further particulars should also be retained to demonstrate that a process was followed.	Destroy	6	years	after	Termination of appointment	Implementation: uses 'appointment' rather than 'termination of appointment' as the trigger event. As the maximum term of appointment to HWU statutory committees is 9 years, the retention period is implemented as 15 years after appointment.	Prescription and Limitation (Scotland) Act 1973 c.52 s6	Policy and Governance, GaLS Schools and Directorates
	Records documenting the appointment/ election/ designation of members of a statutory committee (unsuccessful candidates)	Including application (such as CV and covering letter), interview invitation, personal statement (for election), communications to indicate that the candidate has been unsuccessful.	Destroy	6	months	after	Appointment of successful candidate		UKVI require-ments do not apply as these positions do not	Policy and Governance, GaLS

Revised on 31 Jan 2025
Revisions undertaken by Anne Grzybowski, Records Manager; Lisa Herlihy, Senior Governance Officer; Helen Taylor, University Archivist

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BCS	Record Description (Jisc)	Record Description (HWU)	Disposition Action	Retention period			Trigger event	Notes	Authority	Responsible Org Unit
								require relocation and are not remuner-ated		
	Records documenting the development of induction and training programmes for statutory committee members.	Presentations and notes produced by the colleagues invited to deliver sessions as part of the Court induction programme.	Destroy	5	years	after	Superseded			Schools and Directorates
	Records documenting the training undertaken by individual members of a statutory committee.	Induction attendance records, programmes and materials, as well as any booking confirmations for external training sessions (these must show which member(s) were booked on and attended the training).	Destroy	5	years	after	Completion of training event	.	Prescription and Limitation (Scotland) Act 1973 c.52 s6	Policy and Governance, GaLS
	Records documenting arrangements for meetings of statutory committee a committee.	Communications with the Chair and committee members including regarding attendance, catering orders etc.	Destroy	1	year	after	End of current year		Jisc RRS 2007	Policy and Governance, GaLS Schools and Directorates
	Records documenting the conduct of business of a statutory committee: Correspondence and other records relating to the preparation of committee business or to actions to be taken (or not taken) as a result of committee decisions.	This will not normally be relevant to Heriot-Watt University. Minutes, papers and agendas will be maintained as above, with the Actions Log forming part of papers for each committee meeting. Correspondence relating to Actions Log updates, draft papers etc is not considered to have significant value as a record.	Destroy	5	years	after	End of current year		Jisc RRS 2007	Policy and Governance, GaLS
	Records documenting the conduct of reviews of effectiveness and performance of a statutory committee. (Note from the Scottish Code: The governing body is expected to review its own effectiveness each year and to undertake an externally facilitated evaluation of its own effectiveness and that of its committees, including size and composition of membership, at least every five years. As part of these processes or separately, the effectiveness of the academic board (also known as Senate, Senatus Academicus or academic council) is expected to be reviewed similarly. These reviews should be reported upon appropriately within the institution and outside.)	Including, where applicable, summary results of annual effectiveness surveys for the Court, the Senate and their committees; assurance checks completed against Terms of Reference annually; final report of the external effectiveness reviews (including recommendations) and any meeting notes from steering groups etc that guided the review.	Destroy	0	years	after	Completion of two subsequent reviews	Retaining records of previous reviews provides evidence of effective monitoring over time, as well as compliance with regulatory requirements/ recommendations to undertake reviews. Under the Scottish Code, external reviews are carried out every 5 years. Internal reviews are carried out annually.	Jisc RRS 2007	Policy and Governance, GaLS
	Register of interests of members of the institution's governing body. (Note from the Scottish Code: The institution is expected to publish the register of interests on its website, suitably redacted to take account of data protection duties, and keep it up to date. The Secretary to the governing body and any other senior officer closely associated with the work of the governing body, for example the finance director, must also submit details of any interests to be included in the register.)	Each Register of Interest Form provided by a member and any emails on file where they confirm that their interests haven't changed.	Destroy	6	years	after	Termination of appointment	Implementation: uses 'appointment' rather than 'termination of appointment' as the trigger event. As the maximum term of appointment to HWU statutory committees is 9 years, the retention period is implemented as 15 years after appointment.	Prescription and Limitation (Scotland) Act 1973 c.52 s6	Policy and Governance, GaLS

BCS	Record Description (Jisc)	Record Description (HWU)	Disposition Action	Retention period			Trigger event	Notes	Authority	Responsible Org Unit
Non-Statutory Committee Administration	Records documenting the development and establishment of the terms of reference, and the rules and procedures, for a non-statutory committee.	Records relating to committees and boards that purely relate to operational business, and which send reports to Court or a standing committee of Court. For example: Resource Management Group; Complaints Overview Board; Malaysia Executive Committee; Dubai Executive Committee; University Health & Safety Committee; Global Equality, Diversity and Inclusion Committee; TRAC Development and Resources Modelling Group; Programme Management Board; Scottish Borders Campus Management Committee; Global Information Governance & Data Protection Committee; Combined Joint Negotiation and Consultation Committee.

Records relating to committees and boards that primarily make decisions in relation to individuals. For example: Discipline Committee; Honorary Degrees Working Group. | Destroy | 6 | years | after | End of life of committee | | Jisc RRS 2007 | Policy and Governance, GaLS

Schools and Directorates |
| | Records documenting the conduct of business of a non-statutory committee: agenda, minutes and supporting papers. | | Destroy | 5 | years | after | End of life of committee | | Jisc RRS 2007 | Policy and Governance, GaLS

Schools and Directorates |
Official External Representation	Records documenting the appointment/ designation of staff to officially represent the institution.	Formal appointment letter.	Destroy	0	months	after	Termination of representation		Jisc RRS 2007	
Legal Framework Development	Records documenting the establishment and development of the institution's legal framework	Charter & Statutes	Archive	0	months	after	End of life of institution	Transfer records to the University Archive for permanent preservation 2 years after creation. Reference copies may be retained by the responsible organisational unit	Jisc RRS 2007	Policy and Governance, GaLS
Public Interest Disclosure (Whistleblowing) Investigation	Records documenting the investigation, determination and resolution of an allegation made by a member of staff under the Public Interest Disclosure Act 1998.		Destroy	6	years	after	Closure of case		Prescription and Limitation (Scotland) Act 1973 c.52 s6	Assurance Services, GaLS
Senior Officers' Appointments Administration	Records documenting the appointment/ election/designation of the institution's senior officers	Senior Officers include: Chancellor, Principal, Vice-Principal of the University, Secretary and Campus Provosts.	Destroy	6	years	after	Termination of appointment		Prescription and Limitation (Scotland) Act 1973 c.52 s6	
Governance Framework Development	Records documenting the establishment and development of the institution's governance structure and rules	Ordinances & Regulations.	Archive	0	months	after	End of life of institution	Transfer records to the University Archive for permanent preservation 2 years after creation. Reference copies may be retained by the responsible organisational unit	Jisc RRS 2007	Policy and Governance, GaLS

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