Creating and reviewing retention schedules

This guidance is intended for University staff responsible for setting up records management systems in their part of the University. It gives detailed advice on how to decide how long records should be kept by a business unit, and for drawing up a retention schedule to record these decisions.

What is a retention schedule?

A retention schedule sets out the amount of time that the University needs to keep certain types of records. It applies to records in all formats, including paper records and digital information.

Retention schedules should identify and describe record collections, series or systems, not individual instances of records.

Why do we need a retention schedule?

A retention schedule promotes consistency by ensuring that we keep the same type of record for the same amount of time no matter where the record is held. Retention schedules promote control over the University's records, enable us to dispose confidently of records we no longer need, and ensure the retention of the minimum volume of records consistent with economy and efficiency. The retention of unnecessary records consumes staff time, space and equipment. It also incurs liabilities in terms of the need to service information requests made under data protection legislation and the Freedom of Information (Scotland) Act 2002 (FOISA).

Retention schedules assist with compliance with this legislation. Data protection legislation requires us to keep records for no longer than necessary; we can be sued for retaining unnecessary information if this causes damage to someone. It is a personal criminal offence to destroy information requested under FOISA or the UK General Data Protection Regulation (UK GDPR); a retention schedule will help with accountability under such legislation by enabling us to demonstrate that any destructions have been undertaken in line with proper procedures and requirements. Destructions undertaken without a retention schedule will be open to accusations of improper practice.

Furthermore this legislation requires the University to be transparent about how long we keep records for. The Office of the Scottish Information Commissioner, who regulate compliance with FOISA, expect the University to publish retention schedules in accordance with our obligations to proactively publish information. In addition data protection legislation requires the University to be transparent and tell individuals how long we will keep information about them. Publishing retention schedules for personal data is one way we can do this.

The s 61 Code of Practice issued by the Scottish Executive under FOISA specifically requires organisations subject to freedom of information legislation to have retention schedules for all their records. Although compliance with this Code is not mandatory, it is seen as indicative of whether or not an organisation has complied with the legislation.

What information should be included in a retention schedule?

A retention schedule should contain all the following elements:

- name of the operational area creating or holding the records concerned
- retention schedule version number
- reference numbers (where applicable) of the records
- descriptions of the records
- disposal decision – either destroy, transfer to the University Archives, or, in exceptional circumstances, review at a later (specified) date.
- retention period - a minimum period for which the records should be kept before the relevant disposal action is undertaken
- event which triggers the beginning of the retention period – this could simply be the creation of a record, or a specific event like the graduation of a student or the end of a contract
- dates on which the schedule was agreed and signed

Examples of retention schedules can be found on the website at:

[University retention schedules | Data Protection](#)

Who compiles and maintains the retention schedule?

It is the responsibility of each business unit to develop and implement retention schedules for the records it holds. This might be done by those responsible for carrying out the functions covered by the schedule, or by a nominated records officer for the area concerned. The University's Records Manager will provide guidance and advice to units to create generic retention schedules for common functions. However, it is the responsibility of each business unit to customise schedules for their own use.

How do I compile a retention schedule?

There are six stages to the compilation of a retention schedule. (Figure 1 at the end of this document represents these diagrammatically).

1. Find out what records you have

This is a prerequisite for compiling a retention schedule. If you do not already have one, it is advisable to prepare an information map before starting work. This will tell you what records your area creates, and what they are used for. Confirm that the map covers all the uses of the records by all parts of the organisation, including use for accountability, audit and reference purposes.

If you do not have an information map, you must compile a list of all the different types of records in your business area. This list should include information about their provenance (who created them and for what purpose?), usage (which parts of the organisation have used them subsequently and why?) and content. You may be able to use a pre-existing file list as your starting point, but only if you are confident that records users and creators have followed it. In the absence of any pre-existing information, you will need to conduct a records survey to find out what records the business area holds. A retention schedule developed in this way will have a shorter serviceable life than one based on an information map. This is because it will be based on existing structures rather than functions, and will remain useable only as long as the organisational structure remains unchanged.

2. Identify any duplicate or related records

A record collection's relationship with other records can affect the value of the records to the University. When used in combination with other records the value of

a collection may increase. Alternatively, the collection might duplicate or overlap with another collection of records in such a way that we only need to keep one of the collections e.g. an electronic and a paper set of committee minutes and papers, or a collection of raw data and a report generated from it. If you have compiled an information map, this should help you to identify these relationships. You should ask:

- Are there any related records, in paper or digital formats, which should be considered at the same time as these records?
- Are the records in this collection created (in whole or part) by information drawn from another source?
- Do the records in this collection contribute (in whole or part) to the information contained in records in another collection?

3. Find out if any legislation or regulations affect the retention of the records

Some records are needed for legislative, legal or regulatory reasons. Examples of this are health and safety records, contractual record, examination records and financial records. The people creating the records concerned are most likely to know if there is a legislative or regulatory requirement to keep the records for a certain period of time.

4. Decide how long to keep the records

In deciding how long to keep the records, you should consider their relationship with other records, the business (including legal and accountability) need for the records, the costs associated with keeping the records and their long-term research value. Figure 2 at the end of this document shows this process as a flow chart.

4a. Consider the relationship with other records

You should ask the following questions:

I. Do these records support the interpretation and use of other records? If yes, you must consider both sets of records together to ensure that their retention periods are co-ordinated.

II. Do these records duplicate other records, held within the business unit or elsewhere? If yes, you should decide which set is the official record. (For example, the chair or secretary of a committee will hold the official record set of its papers). The University only has a business need for one official

record set. All others should be destroyed. (In some cases, business sections may decide to keep a duplicate set for a short time, for reasons of convenience. This might arise if you need to consult the records regularly and you do not have quick and easy access to the record set). Before destroying a duplicate set, it is advisable to consult with the 'owners' of the record set to confirm that they are aware of their responsibilities and have no gaps in their records.

III.   If these records are derived from a wider body of information, how much value do they add to the original information? Do we need to keep the wider information and these records or will one of the sets of information suffice?

4b. Consider the business need for, and long-term research value of, the records

You should ask the following questions:

I.   For how long will there be a continuing need for this information for current business processes?

II.   For how long are these records needed to document the business process/ decisions taken/ actions carried out for future reference use?

III.   For how long are these records needed to fulfil legislative, regulatory or financial requirements?

IV.   For how long are these records needed for accountability purposes?

In a number of cases, the answer to these questions will rely on trigger points, such as, 'One year after graduation', 'Four months after the Board of Examiners' meeting'. It is important to choose a trigger point which you can implement. For example, there is no point in saying that records should be kept until an individual dies, if you have no reliable way of knowing whether or not they are alive. Instead, choose a trigger point based on the information you have about the individual; in this case 100th birthday might be a suitable trigger point.

4c. Implications of not having records versus the cost of keeping them

> You need to consider the possible implications of not having the records, balanced against the cost of keeping the records. Every document retained represents a resource burden for the university, in terms of storage costs, administration, and freedom of information and data protection obligations.

4d. Consider if the records have a long-term research value for historical or other purposes.

> Examples of records where this would apply include the final minutes and papers of official University committees, or background discussions and correspondence on matters where the University was an innovator. The [University Archive collection policy and selection criteria](#) give further information on the types of material that should be offered to the University Archives.

> The University Archives must be invited to comment on all draft retention schedules to ensure that all records of research value have been identified, and that no unnecessary records are marked for preservation in the University Archive.

These stages 4a to 4d can be represented in the following matrix:

	High	Medium	Low	Very Low
How likely is it that we will need the records again for business purposes?				
How serious would the consequences be if we did not have the records?				
How expensive is it to keep the records?				
What long-term research value do these records have?				

This matrix will not provide a simple answer, but is intended to help you to balance the issues involved in deciding whether to keep the records. A medium or high response to the first two, or the last, questions is a strong indication that the records should be kept, provided that the resource implications are not too high. If a set of records is critical to the business of the organisation but the resource implications of keeping them are very high this collection will require careful consideration before fixing a retention period. Records consistently rated as low/very low are either not required for continuing business purposes or are likely to merit preservation for a short period e.g. 1-2 years. Annex A contains examples of records which can be destroyed after a very short retention period.

You can use this matrix to help you decide the retention period for records by considering how the answers to the questions would change over time. Possible retention periods to consider are, immediately after creation, after 6 months, after 1 year, after 2 years, after 5 years, after 10 years etc. You are unlikely to need to consider each of these periods for every record set.

5. Consultation

In developing a retention schedule, it is important to involve as many users of the records as possible, usually by inviting them to comment on the work in progress. This is to ensure that the schedule is fully comprehensive and accommodates all uses of the records. Once you have compiled a draft retention schedule, it should be circulated for comment to all users or potential users of the records (or their representatives), the University Archives and the Records Manager.

6. Sign off

The final retention schedule should be signed by the head of the business unit concerned. Once the schedule is agreed it should be made available online and a link provided to the Records Manager.

How can I implement my retention schedule?

There is a close relationship between the retention schedule and your filing scheme. You should organise your records and filing structure or information architecture so that it is possible to carry out the disposal instructions given in the retention schedule and to aid the efficiency of this process. This means that you need to ensure that

your metadata (usually contained in the inventory) includes information required for trigger points, and that each file should contain information with similar retention periods. For example, if it is decided to destroy personnel records when a person reaches their 100th birthday, the file title or the metadata about the file should include the date of the 100th birthday so that files due for destruction can be readily identified. If the requirement is to destroy parts of a student record one year after the student has left the University, it is advisable to keep together in one file all those items due for destruction at one year. Weeding individual papers from a file is inefficient and should be discouraged at all times.

You are responsible for ensuring that disposal action is undertaken at the prescribed periods and in a manner commensurate with the sensitivity of the material. Before destroying any material, it is advisable to confirm the destruction with the business section concerned as the business need for the material may have changed since the retention schedule was drawn up, or particular circumstances, such as a lawsuit, may require some of the records to be kept for longer than usual. If you receive consistent feedback that the retention period for a particular set of records is too short, then this should trigger a revision to the schedule.

You must not destroy any records which are currently the subject of a data protection or a freedom of information request until the response to the request is complete.

How do I maintain a retention schedule?

Organisations change over time, and for a retention schedule to remain of value it must be kept up to date. It is advisable to review schedules every five years to confirm that they are still relevant. Issues to consider are:

1.   Have the functions changed since the schedule was compiled?
2.   Have the processes changed?
3.   Has the information generated and used changed?
4.   Has the regulatory or legislative framework changed?
5.   Is the pattern of usage of these records in line with their retention period?

This programme of review is intended to identify changes which might otherwise have been overlooked. It is not intended to replace ad hoc updates made to the retention schedule as and when change occurs.

What help is available?

The University's Records Manager provides advice, guidance and training on records management issues, including the creation of retention schedules. The University also maintains a number of generic retention schedules for common University functions.

These retention schedules are available at:

[University retention schedules | Data Protection](#)

The Joint Information Systems Committee (JISC) has prepared a high-level business classification scheme and retention schedule for the functions and activities of universities. This was updated in 2025. This can be used as the starting point for deciding the retention periods of our records but requires significant customisation. It can be found at:

[Records retention management - Jisc](#)

The National Archives have prepared model retention schedules for common types of government records, including buildings, personnel, finance, health and safety, projects, press and publicity, complaints, contracts, internal audit and information management records. Although the recommended retention periods are for government records rather than University ones, these schedules are a useful source of precedents. They can be found at:

http://www.nationalarchives.gov.uk/information-management/browse-guidance-standards/?letter=r&keyword=retention

About this guidance

Version control	Author/editor	Date	Edits made
11	Rob Don	February 2025	JISC addition and amendment of routine record destruction
10	Rob Don	May 2024	Amended broken links.
9	Claire Friend	March 2018	Reformatted for accessibility.
8	Sara Cranston	December 2016	Clarified role of Records Management Section
7	Sara Cranston	December 2016	Reformatted. Updated links. Added requirement to publish schedules. Minor textual amendments

If you require the guidance in an alternative format, please contact the Records Manager at Rob.Don@ed.ac.uk

Annex A: Examples of records which may be routinely destroyed

As a rule, the following types of records have no significant operational, informational or evidential value. They can therefore be destroyed as soon as they have served their primary purpose.

- Reference copies of University records.
- Announcements and notices of meetings and other events, and notifications of acceptance or apologies.
- Requests for 'stock' publications, maps/directions, brochures etc.
- Requests for, and confirmations of, reservations for internal services (e.g. meeting rooms, car parking spaces, pool cars) where no internal charges are made.
- Transmission documents: routine communications (letters, emails etc.) regarding administrative matters with no further value, routing slips, compliments slips and similar items which accompany documents but do not add any value to them.
- Superseded address lists, distribution lists etc.
- Duplicate documents such as:
    - o 'CC' and 'FYI' copies,
    - o unaltered drafts,
- Working papers, where the results have been written into an official document and which are not required to support it.
- Published or reference materials received from other parts of the institution or from vendors or other external organisations which require no action and are not needed for 'record' purposes, e.g. trade magazines, vendor catalogues, flyers, newsletters.

Figure 1: Retention scheduling process

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┌─────────────────────┐
│ What records do we   │
│       have?          │
└─────────────────────┘
          │
          ▼
┌─────────────────────┐     ┌──────────────────┐     ┌──────────────────┐     ┌──────────────────┐
│ Identify duplicate   │ ──▶ │ Are there any    │ ──▶ │ Are these records│ ──▶ │ Do these records │
│ or related records   │     │ related records  │     │ created by       │     │ contribute to    │
└─────────────────────┘     │ which should be  │     │ information drawn│     │ information      │
          │                  │ considered at the│     │ from another     │     │ in other records?│
          │                  │ same time as     │     │ source?          │     │                  │
          ▼                  │ these records?   │     └──────────────────┘     └──────────────────┘
┌─────────────────────┐     └──────────────────┘
│ Identify legislative │
│ or regulatory        │
│ requirements         │
└─────────────────────┘
          │
          ▼
┌─────────────────────┐     ┌──────────────┐   ┌──────────────┐   ┌──────────────────┐   ┌──────────────┐
│ Decide how long to   │ ──▶ │ Consider the │ ▶ │ Consider the │ ▶ │ Balance the cost │ ▶ │ Consider the │
│ keep the records     │     │ relationship │   │ business need│   │ of keeping the   │   │ long-term    │
└─────────────────────┘     │ with other   │   │ for the      │   │ records against  │   │ research     │
          │                  │ records      │   │ records      │   │ the implications │   │ value        │
          ▼                  └──────────────┘   └──────────────┘   │ of not having    │   └──────────────┘
┌─────────────────────┐                                            │ them             │
│    Consultation      │                                           └──────────────────┘
└─────────────────────┘
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Information map informs process

Survey informs process

File list informs process

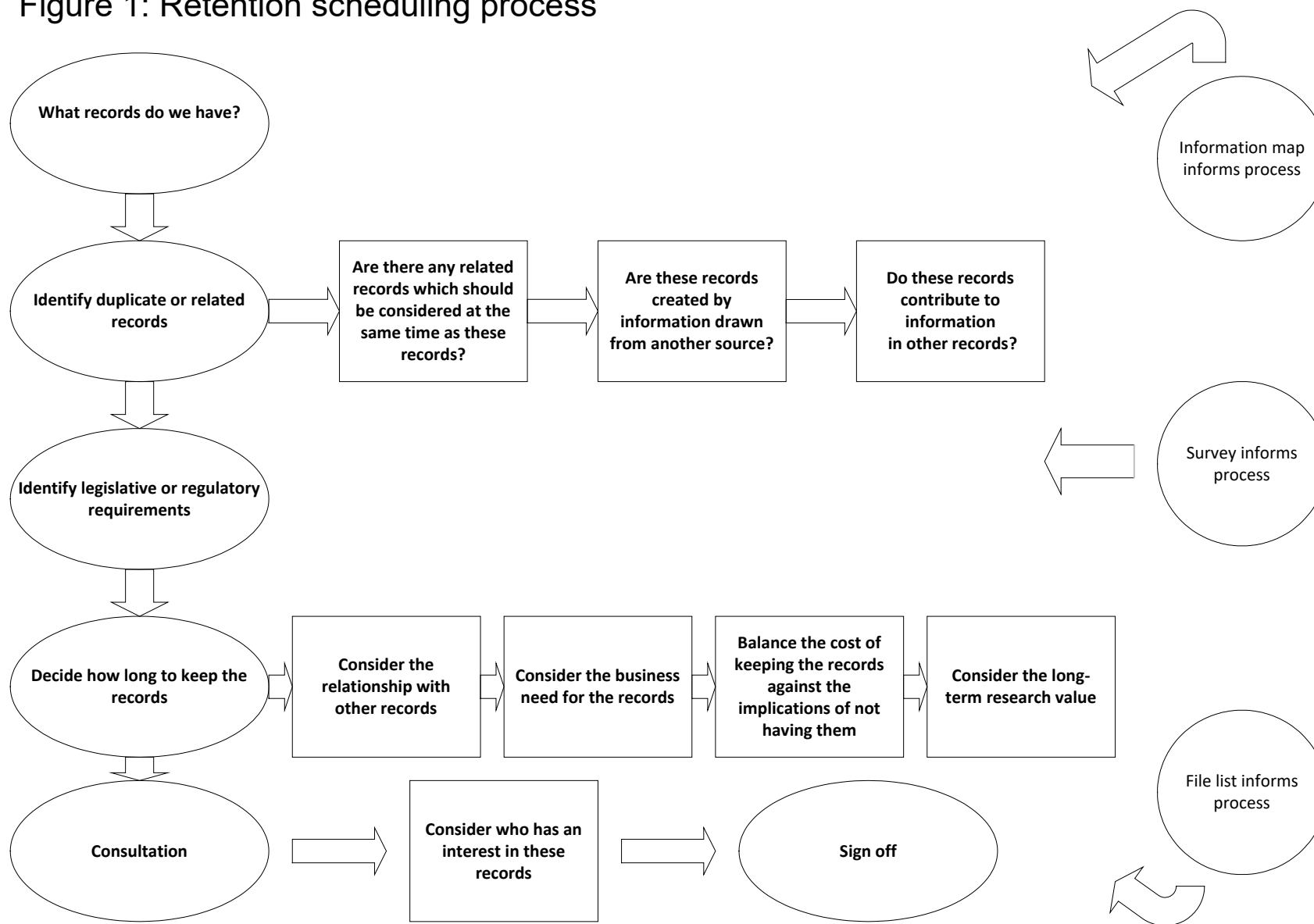Consultation → Consider who has an interest in these records → Sign off

Figure 2: Deciding how long to keep records

A

Are the records needed for legislative or regulatory reasons? — **Yes** → For how long?

No

Are the records needed for accountability purposes? — **Yes** → For how long?

No

What are the cost implications of keeping these records? — **Low** → The retention period should be the longest period identified in response to the question, 'For how long?' (Subject to cost assessment)

High

Confirm that value of records justifies cost of retention by considering consequences of not having records — **Yes** → Retention decision remains unaltered

No

Revise retention decision

Do the records have long-term research value? — **Yes** → Transfer to the University Archives once administrative need has ceased

Destroy in line with retention schedule