

Records Retention Schedule Procedure

To identify agreed retention periods for the TU Dublin records, to facilitate appropriate disposal of records in line with agreed procedures and to ensure that records of permanent value are identified and preserved.

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1. Document Control Summary

Area	Document Information
Author	Information Governance Senior Manager
Owner	Head of Governance and Compliance
Reference number	
Version	1.1
Status	Approved
Approved by	Head of Governance and Compliance
Approval date	14/10/2025
Next review date	3 years
Document Classification	Public

2. Introduction / Context

The University is responsible for the processing of a significant volume of records, both personal and non-personal, across each of its Faculties, Schools and Professional Service Areas.

The objectives of this Record Retention Schedule (RRS) include:

- Ensuring that TU Dublin records are retained for as long as they have administrative or legal value.
- Ensuring that TU Dublin records are disposed of only after minimum legal retention requirements have been met.
- Avoiding the unnecessary retention of TU Dublin records that have outlived their usefulness.
- Ensuring that records of on-going historical or research value are retained and are transferred to the Archives at the appropriate time in line with agreed procedures.
- Ensuring that decisions regarding the retention and disposal of records are taken and implemented as part of a coordinated TU Dublin policy, and not on an ad-hoc or informal basis by individual staff members or departments.

The benefits that will derive from successful implementation of this RRS include:

- Compliance with legislative and regulatory provisions regarding the retention of records.
- Avoidance of unnecessary accumulation of records in various formats.
- Controlled disposal of records in a managed and coordinated manner, in line with agreed procedures.
- Financial savings with regard to the on-going storage of records which may appropriately be disposed of.
- Efficient identification of records of archival value.

3. Purpose

The purpose of this Records Retention Schedule (RRS) is to identify agreed retention periods for the records of Technological University Dublin, (hereafter known as “TU Dublin” or “the University”), to facilitate appropriate disposal of records in line with agreed procedures and to ensure that records of permanent value are identified and preserved.

4. Scope

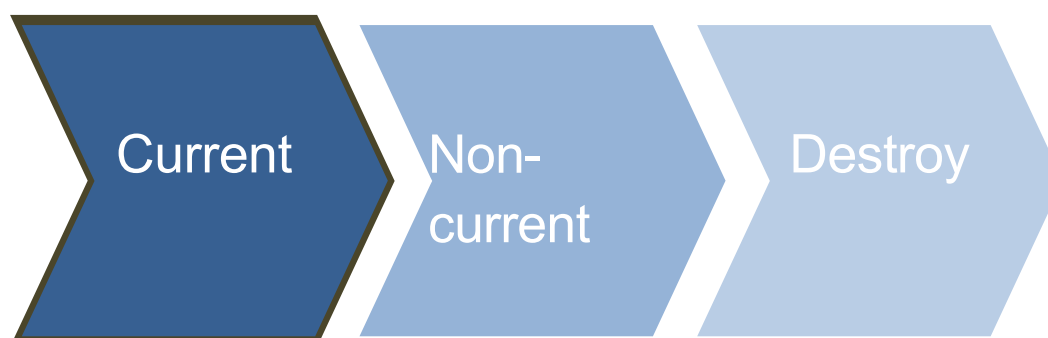
This Records Retention Schedule applies equally to paper copy and to digital records, including emails and all other formats.

5. Definitions

- **Activities** – The things an organisation has to do to carry out its functions.
- **Archives** – Archives are those records of the University which are deemed worthy of permanent preservation due to the value of the information that they contain. Archives can exist in any format, including paper, audio-visual and digital.
- **Current Records** - Records relating to on-going activities, which should be held in the immediate environment/office for frequent use.
- **Destroy** – The record should be destroyed in line with the University's agreed Records Disposal Procedures.
- **Disposal Certificate** – a document which approves disposal of records in line with the University's **Records Retention Schedule** and records certain details about the manner of the disposal.
- **Disposition** – Range of processes associated with implementing records retention, destruction or transfer decisions which are documented in disposition authorities or other instruments.
- **Non-current records** – Records which relate to completed activities and are not frequently referred to in order to conduct business but should be held conveniently for more limited access.

6. Deciding on retention periods

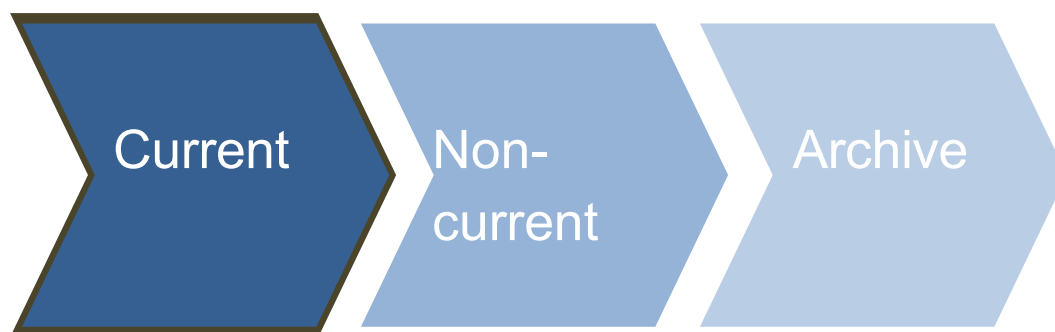
A useful way of understanding records management is in terms of the 'life cycle' of a record. According to this approach, records go through three phases.



In the first phase, after they are created, they are part of the current business of the University. For instance, when a purchase is made, a purchase order is raised, and an invoice is received; until the payment is made and for some time after, these are current records and need to be held close at hand.

Usually, once the payment is made, the matter is closed, and the documentation may never need to be looked at again. But in case it does, it is necessary to hold onto it. The records need to be stored for some time, often offsite. This is sometimes called the non-current phase.

Finally, there is a time when the records are no longer needed. For many record types, there is no fixed date for this but, for instance, most organisations keep financial records for at least seven years, because there is specific legislation which sets a minimum retention period for such records. At this point, the records can be destroyed.



Not all records should be destroyed when no longer required for business use or when the legal minimum retention period has elapsed. Some records are worthy of permanent preservation as archives and will be transferred to the University Archives to be made available to the public for research purposes. This is known as the archive phase.

NB – this should not be confused with the non-current stage when records in storage are sometimes described as being ‘archived.’ Genuinely archival records are intended to be kept permanently.

Retention periods are decided based on:

- The administrative need of the University, i.e., how long does the University need the record to carry out its activities?
- Legal need, i.e., is there a particular requirement to keep the record for a certain period, even after the activity has been concluded?
- Historical value, i.e., does the record have an ongoing historical value which would justify retaining it for transfer to the Archives?

The retention periods in this RRS have been developed in consultation with the TU Dublin Faculties, Schools and Professional Service Areas that create, receive, use and maintain the records. Relevant legislation and regulations have also been consulted, and records management best practice has been applied.

As new legislation and regulations may be introduced which affect records retention requirements, this RRS should be subject to periodic revision and update.

7. Format of the Records Retention Schedule

7.1 Functions and Activities

The Records Retention Schedule lists each of the functions of the University and gives them each an alphabetic code.

It then lists the principal sub-functions or activities within each area.

Some functions may be conducted entirely within a particular unit or office, while others may have input from a number of areas. **Records are only listed under the Functional area primarily responsible for them.** This ensures consistency of implementation and avoids duplication.

For example, while Freedom of Information is a consideration throughout the University, primary responsibility lies with Governance and Compliance, so this function appears under this professional

service area in the Retention Schedule. Reference to FOI records is not duplicated under other headings.

Functions and Activities are broken down into record types. For each of these record types, a retention period is identified.

The various columns in the Schedule are as follows:

Record	The record type
Trigger	Event that prompts the start of retention period
Retention Period	Period for which the records should be retained
Action	The action to be taken when the non-current period has expired
Rationale	The basis on which the Action is recommended
Data Classification	The security classification category assigned to the records
Data Steward/Data Manager	The title of the officeholder primarily responsible for the records and for ensuring implementation of the RRS in respect of those records. The job title should be entered rather than individual name, preferable as personnel may change over time.

7.2 Column Headings

Trigger

The Trigger is the event that prompts the start of the retention period. It tends to be based on either a defined point in the business process it supports (for example, termination of a contract or project, closure of an employee file) or on a calendar date, often the end of the current year to which the record relates. Where the trigger given is 'end of year' this has been further defined by calendar year, financial year or academic year, depending on what makes most sense operationally.

Retention Period

The period in years (unless otherwise stated) for which the record should be retained after the trigger event before the disposal action is carried out. See section 6.3 below for further details.

Action

This stipulates the action to be taken when the non-current period has expired.

- **Destroy:** the records should be securely disposed of, in line with the University's records disposal procedures. Proper authorisation should be secured for any disposal.
- **Retain permanently within the University:** certain records should be retained on a permanent basis by the University and transferred to the Archives.
- **Review for Archives:** in a small number of cases, the RRS may recommend that records be reviewed before agreeing the final Action. This should arise with regard to a small percentage of records, where their long-term value is unclear. In such cases, records are to be reviewed by the Information Governance Office.

Rationale

This briefly explains the basis on which the agreed Action has been decided. It may be a specific piece of legislation, a Statutory Instrument, or standard best practice that has arisen with regard to specific record types. See section 6.4 below for further details.

Data Classification

Each record type is assigned a security classification category, in line with the University's agreed **Data Classification Policy**. The categories are Public, Internal, and Confidential.

Data Steward/Data Manager

All records generated and retained by the University are TU Dublin records and do not belong to individual staff members. The officeholder identified here does not own the records but is the person primarily responsible for the implementation of the Retention Schedule. The job title should be entered, rather than the name of an individual person

7.3 Retention Periods

Retention periods appear in a number of formats in the RRS.

Specific number of years (e.g., 3 years, 5 years, etc.): this means that the records should be retained for the specific number of years after the stipulated trigger point.

Until superseded: this normally appears in relation to policies, procedures, guidelines, and other records which are reviewed and re-issued from time to time. Such records should be retained as current records until they are superseded by an updated version.

Permanent: this relates to records which are identified for transfer to the Archives. Such records should be retained by the relevant department until they are no longer required within that department. They should then be transferred to the Archives in line with agreed procedures, where they will be properly preserved and safeguarded and, eventually, made available for research purposes if appropriate.

7.4 Rationale

The rationale may refer to specific legislation which stipulates retention periods for certain types of records, for example the Taxes Consolidation Act, 1997, for certain Finance records.

In some cases, the rationale is based on legislation that does not quote specific retention periods but is an important factor influencing records retention and disposal decisions, for example the Data Protection Acts/GDPR.

Where there is no specific legal stipulation with regard to certain record types, the term “Industry Standard” appears. In such cases, the rationale is based on accepted best practice or precedents used elsewhere in the higher education sector or the public service.

The Rationale also takes account of National Archives guidance in a number of areas. Although TU Dublin is not subject to the National Archives Act, this guidance provides good advice regarding record types which are common across the public sector in general.

8. Disposal of Records

Records scheduled for disposal should be securely disposed of in accordance with their assigned data classification level

9. Related Documents

This procedure should not be viewed in isolation. This procedure supports the following compliance and IT security policies;

1. Records Retention Departmental Schedules
2. TU Dublin Data Classification Policy
3. TU Dublin Data Management, Retention and Destruction Policy
4. TU Dublin Information Security Policy

10. Document Management

10.1 Version Control

VERSION NUMBER	VERSION DESCRIPTION / CHANGES MADE	AUTHOR	DATE
1.0	Initial Procedure	Information & Compliance Working Group	
1.1	Review and Update	Information Governance Team	04.10.23
1.2	Review and Update	Information Governance Team	14.11.24

10.2 Document Approval

VERSION NUMBER	APPROVAL DATE	APPROVED BY (NAME AND ROLE)
1.2	15.10.2025	Head of Governance & Compliance

10.3 Document Ownership

Document Owner – Head of Governance and Compliance

Document Update - Information Governance Senior Manager

10.4 Document Classification

Document is classified as Public and is available to all staff, students and members of the public who wish to view it.