



## **DPN DOCUMENT RETENTION POLICY**

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# PURPOSE AND SCOPE

This policy relates to records (including electronic data) belonging to Digital Peninsula Network (DPN).

This policy is formed of two parts: this document sets out the general principles and responsibilities, while the Records Retention Schedule sets out the length of time DPN's records should be retained.

Records are a vital asset required by DPN 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 is therefore imperative and DPN recognises the importance of this activity.

The purpose of this records retention policy (and associated retention schedule) is to promote best practice in records management in order to protect the interests and support the core functions of DPN 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 and operational 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. DPN also desires to comply with 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 the Act as well as the Data Protection Act 2018 and GDPR 2018.

This policy is subject to the laws and regulations of relevant jurisdictions and may be modified and supplemented from time to time. Other policies may be relevant in relation to records retention.

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# DEFINITIONS

Records are defined as "information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business" (ISO 15489-1:2001 s.3.5).

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Recorded information includes documents and data and can be in any format or media, including paper, film and digital or electronic media (see appendix 1 for a non-exhaustive list of possible formats). This policy applies to recorded information in all possible formats.

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.

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 may include the starting point for its calculation, the length of time and what action should be taken when the period expires. The Records Retention Schedule forms part of this policy.

A records series is a group of similar or related records that 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).

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## PRINCIPLES

Records that are created or received and maintained by DPN employees - and those working for DPN as contractors - in the course of their business activities for DPN, are deemed to be records belonging to DPN.

DPN records are a valuable resource as sources of information for re-use and as evidence of actions, rights 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.

During their retention period, records may be held on different media depending on operational efficiency but should always be properly managed in accordance with this and other policies.

The majority of records will eventually be destroyed.

Retention policies 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.

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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 sources.

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.

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.

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## **RESPONSIBILITIES**

Ultimate responsibility for compliance with this policy shall lie with the Managing Director.

The Managing Director is responsible for drawing up guidance for good records management practice, procedures and promoting compliance with this policy.

The Managing Director is responsible for managing the consistent implementation of the records retention policy. He should make available to other employees the relevant policy, procedures, retention schedules and advice. He may also manage the provision of records storage and/or media conversion. 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.

The Managing Director must ensure that his staff are adequately trained and are made aware of the key principles of this and related policies.

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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 should be done in compliance with the relevant 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.

Employees who are responsible for authorising the destruction of time-expired records must respond to review requests promptly.

Compliance with this Policy and related procedures is mandatory. Compliance will be monitored by the Managing Director.

Where permitted by law, any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

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## CONTACTS

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