

IMPERIAL

DATA RETENTION POLICY

1. Purpose and Scope

- 1.1 Imperial is committed to effective records management. This enhances efficiency, reduces duplication and storage requirements, and ensures that Imperial has clear records documenting its work and decisions. This Data Retention Policy (“the Policy”) ensures Imperial complies with legal and regulatory requirements whilst maximising the cost benefit of retaining data.
- 1.2 The Policy covers all physical and digital records, in all locations, which are created, received and / or maintained by Imperial. There are some exceptions regarding some research data and records that are deemed to be of historical value. Exceptions of entries that are held outside the terms of the Policy must be approved by the Chief Legal Officer & Deputy University Secretary in their role as Senior Information Risk Owner.
- 1.3 This Policy applies to all staff and students of Imperial.
- 1.4 Records are generated in the course of work and detail the evidence of what happened, when it happened, where it happened, why it happened, and who was involved. Because of the evidentiary value of records, they need to be kept safely, securely, in line with legislation and regulatory best practice, and to form the history of the organisation.
- 1.5 As such, all records have a retention requirement, during which time the record can be accessed and inspected, but not be disposed of, overwritten or changed.
- 1.6 The Retention Schedule quantifies the retention period for data types, however, this must be applied in line with other restrictions and policies on how data is held across Imperial, such as restrictions on email and digital storage capacities.

2. Retention Schedule

- 2.1 Imperial’s Retention Schedule (“the Schedule”) sets out the retention periods in place for the University’s records. The full Schedule is in the Appendix to this Policy.
- 2.2 The Schedule uses the JISC 2025 Retention Schedule as its basis. JISC is a UK not-for-profit organisation that provides digital technology, data services, and infrastructure for the UK’s higher education, research, and innovation sectors.
- 2.3 Any requests for amendment, or queries regarding records or retention periods, should be emailed to the Archives and Corporate Records Unit (“ACRU”): acru@imperial.ac.uk
- 2.4 Physical or digital records with permanent historical value, that are permitted to be archived for historical research purposes, should be transferred to ACRU; ACRU can store physical or digital records until such time as they should be destroyed.

3. Using the Retention Schedule

- 3.1 Record types are grouped into broad business functions in column (a) and activities in column (b), with scope notes (c) outlining the main types of records generated by doing that activity. The retention period is shown in column (e), and this is calculated from the trigger point shown in column (d), with action to take and rationale shown in columns (f) and (g).
- 3.2 Any records needed for legal, Freedom of Information, Data Protection, Health & Safety, or for staff / student casework reasons, should be retained until the conclusion of the case / completion of procedures, even if the record would otherwise be scheduled for destruction.

POLICY AND DOCUMENT CONTROL	
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Division / Department / Function:	Division of the University Secretary on behalf of UMB
Policy owner:	Registrar & University Secretary
Point of contact(s):	Division of the University Secretary (university.secretary@imperial.ac.uk)