



*An Associated College of
Trinity College Dublin, the University of Dublin*

Marino Institute of Education

RECORDS RETENTION SCHEDULE

Policy Title:	Records Retention Schedule
Description:	This document states the storage and retention arrangements and the final disposition requirements for all records belonging to MIE and associated with MIE activities.
Author (Position):	Data Protection Officer
Version:	2.1
Approved By:	Governing Body
Policy Approval Date:	November 2023
Date of Next Policy Review:	June 2027 (or as necessary)

Contents

1. Institute-wide Records	5
1.1. General Corporate/Administrative Records	5
1.2. Other Administration Records	8
1.3. Legal Records.....	9
2. Research Records	10
3. Registrar's Office/Faculty Student Records.....	13
3.1. Student Applications	13
3.2. Undergraduate and Postgraduate Institute Records	14
3.3. Examinations, results, graduation records	16
4. Finance Records.....	18
4.1. Accounts Payable	18
4.2. Accounts Receivable.....	18
Bank Records.....	19
4.3. Financial Statements	20
4.4. Fixed Assets	20
4.5. Agreements	21
4.6. Procurement	21
4.7. Payroll.....	22
4.8. Records held by divisions/schools/offices etc other than finance/accounts section	
22	
5. HR Records.....	23
5.1. Recruitment/competition files/assessment boards	23
5.5. Employee Relations.....	27
6. Classes or Records held by specific Institute/Office areas.....	29

6.1. Estates and Facilities	29
6.2. Insurance	31
6.3. Library.....	32
6.4. IT &eLearning Services	32
6.5. Institute health centre and student counselling service.....	32
6.6. Public Affairs and Communications	33
6.7. Information Compliance	34
6.8. General Administration.....	34

Note: * denotes records retained in hard copy.

1. Institute-wide Records

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
1.1. General Corporate/Administrative Records					
Office of the President	Institute Statutes *	Retain indefinitely	Virtual server/MS Teams * Archive in President's Office. Restricted Access.	Legitimate Interest	Appropriate filing/archiving
Office of the President	Strategic Plans	Retain indefinitely	Virtual server/MS Teams	This does not include personal data and is available on MIE website.	Appropriate filing/archiving
Office of the President	Records of Governing Body and its committees – Audit, Finance (Agenda, minutes, support documents)	<p>ONE approved set of signed hard copy minutes and associated documents is retained in a secure location indefinitely (archived) in the President's Office.</p> <p>One complete digital version of GB meeting materials is retained online under restricted access by the President's Office.</p> <p>One FOI-ready set of minutes is retained in digital format by the President's Office with restricted access.</p> <p>The minutes and supporting documentation (hard copy) for Finance and Audit committees are to be retained securely with restricted access in the CFO's Office.</p> <p>One copy of signed minutes and documents for Finance and Audit committees to be retained in digital form (on SharePoint) with restricted access.</p>	Virtual server/MS Teams	Legitimate Interest	Appropriate filing/archiving

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
Office of the President	Records of Leadership Team (Agenda, minutes, support documents)	<p>ONE approved set of signed hard copy minutes and associated documents is retained in a secure location indefinitely (archived) in the President's Office.</p> <p>One complete digital version of LT meeting materials is retained online under restricted access by the President's Office.</p> <p>One FOI-ready set of minutes is retained in digital format by the President's Office and is published on Moodle with restricted internal access.</p>	Virtual server/MS Teams	Legitimate Interest	Appropriate filing/archiving
Office of the President	* Elections to Board – voting records etc	Nomination and Ballot papers, and any related correspondence are retained securely in the President's Office until the process, including appeal period, has been completed. Papers are shredded securely within X days of the election taking place.	* Elections are held in Education Office and all papers following the close of the ballot and count, are transferred to the President's office	Legitimate Interest	Confidential shredding/secure deletion of electronic records
Registrar's Office/Quality	Institute policies and procedures	Retain current until superseded	Virtual server/MS Teams	Legitimate Interest	Appropriate filing/archiving
Registrar's Office	Records of internal/operational meetings – Courts of Examiners etc. (Agenda, minutes, support documents)	Retain for 5 years after relevant action completed	Shared Folder or MS Teams/One Drive	Legitimate Interest	Confidential shredding/secure deletion of electronic records
Registrar's Office	Records of Academic Council (Agenda, minutes, support documents)	Retain indefinitely	Virtual server/MS Teams	Legitimate Interest	Appropriate filing/archiving
Course Leaders	Records of committees where Department/ School/ Unit represented only (ie where office does not	Retain for current year plus 1 year, or until actions are completed	Virtual server/MS Teams	Legitimate Interest	Confidential shredding/secure deletion of electronic records

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
	hold <u>primary</u> responsibility for records) eg agenda, minutes, documents relating to agenda items ie reports etc				
President/Rannóg/ Function Heads	Institute risk register, local risk registers	Retain for 5 years after superseded.	Virtual server/MS Teams	Legitimate Interest	Confidential shredding/secure deletion of electronic records
Budgets = Finance Student No = Registrar's Office	Projections and statistical analysis	Retain for current plus 6 years	Virtual server/MS Teams & Sage	Legitimate Interest	Confidential shredding/secure deletion of electronic records
Chair of Meeting	Handwritten notes taken by recording secretary present at meetings	Retain until minutes have been agreed and signed by chairperson at following meeting of the committee	Virtual server/MS Teams	Legitimate Interest	Confidential shredding/secure deletion of electronic records
All	General (non-HR) written allegations/complaints; records received/created in relation to investigation of allegations/complaints	Retain for 18 months after resolution of complaint from date of last correspondence, and closure of all claims and appeals	Virtual server/MS Teams	Statute of Limitations for statutory employment claim is 6 months under the Organisation of Working Time Act 1997 and the Unfair Dismissals Act 1977. WRC and the Labour Court can extent this time to 12 months. I have suggested 18 months to allow for the defence of any claims.	Confidential shredding/secure deletion of electronic records (ref deletion schedule)
All	Significant HR cases which set precedents or result in changes to Institute policy	Anonymised data may be retained indefinitely	Virtual server/MS Teams	For reference	Appropriate filing and archiving

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
All	Routine administration records	Retain for 12 months or until actions have been completed	Virtual server/MS Teams	For reference	Appraise and evaluate for secure archiving where relevant otherwise, confidential shredding/secure deletion of electronic records
All	General correspondence, including emails	Retain for 12 months, or until they cease to be of administrative use	Virtual server/MS Teams	For reference	Appraise and evaluate for secure archiving where relevant otherwise, confidential shredding/secure deletion of electronic records
1.2. Other Administration Records					
Vice President for Education and Strategic Development	Teaching allocations/ semester schedules (not personal data)	Retain until superseded	Semester Schedules are stored on the Shared File and archives at the end of each semester to another folder on the Shared File.	The timetables are retained as historical data for our courses	Appropriate filing/archiving
All	General correspondence including emails (eg requests for Dean/Heads to speak to societies, requests for funding etc)	Retain for 12 months, or until they have ceased to be of administrative use	Virtual server/MS Teams	For reference	Appraise and evaluate for secure archiving where relevant otherwise, confidential shredding/ secure deletion of electronic records
Quality Office	Quality reports, quality assurance peer reviews	Retain until superseded	Shared folder or MS Teams/One Drive and website	Statutory requirement	Confidential shredding/secure deletion of electronic records

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
1.3. Legal Records					
Chief Financial Officer	Legal cases	2 Years from date case and all appeals are closed	Virtual server/MS Teams	Legitimate interest	Personal data redacted and retained indefinitely in anonymised format.
Chief Financial Officer	Copyright records/trademark registration	Retain indefinitely	Virtual server/MS Teams	Legitimate interest	Appropriate filing/archiving
Chief Financial Officer	Legal advice	Retain indefinitely	Virtual server/MS Teams	Legitimate interest	Appropriate filing/archiving
Chief Financial Officer	Legal correspondence	Retain indefinitely	Virtual server/MS Teams	Legitimate interest	Appropriate filing/archiving
Chief Financial Officer/ Head of Department for department-based services or commercial contract	* Contracts for services	See also Finance (Procurement & Capital Projects)	Virtual server/MS Teams * Contracts for services and commercial contracts held in related department (ref MIE Procurement Policy and Procedures)	Contractual necessity	Appropriate filing/archiving
Chief Financial Officer/ Head of Department for department-based services or commercial contract	* Commercial contracts	See also Finance (Procurement & Capital Projects)	Virtual server/MS Teams Contracts for services and commercial contracts held in related department (ref MIE Procurement Policy and Procedures)	Contractual necessity	Appropriate filing/archiving
Facilities	* Maintenance contracts	Retain indefinitely	Shared Drive or MS Teams/One Drive	Contractual necessity	Confidential shredding/secure

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
			* Some records held in secure storage in Estates & Conferencing Office		deletion of electronic records

2. Research Records

Note: all records to be managed in keeping with MIE Research Policy

Owner	General class or records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
Marino Ethics in Research Committee (MERC)	<p>Proposal/ research funding applications (eg forms, applications, reports, minutes, additional supplementary materials, etc)</p> <p>MERC has access to the following data:</p> <ul style="list-style-type: none"> MERC application forms Minutes of MERC Meetings <p>Reports are generated from minutes so not sure if any Risk Register relevancy</p> <p>MERC does take a report from MES Research Proposal</p>	Retain one copy (virtual) within relevant school research institute/ centre/ group for 5 years from submission (all other copies to be deleted following completion of process)	MS Teams	Contractual necessity	<p>Appraise and evaluate for secure archiving where relevant otherwise, confidential shredding/secure deletion of electronic records by Research Office.</p> <p>Notification system for deletion to be used.</p>

Owner	General class or records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
	<ul style="list-style-type: none"> Assessment Committee <p>MERC does not have access to proposals or research funding applications.</p>				
Individual Lecturers	Records relating to unsuccessful applications	Retain within relevant School research/ centre/ group for 18 months from the date the application procedure ends	Password protected computer – MS Teams	Like recruitment materials, unsuccessful research applications data should only be retained for 18 months to allow for the defence of potential claims but may be retained for longer with the data subject's consent.	Appraise and evaluate for secure archiving where relevant otherwise, confidential shredding/secure deletion of electronic records.
Principal Investigator	Research Project Administration (research contracts, reports, correspondence and other administration, formal reviews, non-disclosure/ confidentiality agreements, etc)	Retain within relevant school/ research/ centre/ group for 10 years from submission of final report OR for the duration of specified in the contract with the funding provider, whichever is longer	MS Teams/One Drive	For reference, to inform further applications	Appraise and evaluate for secure archiving where relevant otherwise, confidential shredding/secure deletion of electronic records.
Principal Investigator	Reporting: Papers, reports (annual, final), etc	Retain indefinitely	MS Teams/One Drive	For reference, to inform further applications	Not Applicable
Principal Investigator	Research data and finding: Laboratory notebooks, statistical	Retain for a minimum of 10 years from submission of final report OR for the duration specified in the contract with the funding provider, whichever is longer	MS Teams/One Drive	<p>To ensure research integrity</p> <p>To inform further publications and research</p>	Personal data is subject to the Data Protection Acts 1988, 2003 & 2018. Research should undertake, at the earliest opportunity, to anonymise personal data

Owner	General class or records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
	records, anonymised interview transcripts etc ¹				held for the purposes of research.
Individual level as appropriate	Commercialisation of research: legal, financial, general correspondence, etc Records relating to Institute owned inventions /intellectual property, licence agreements, confidentiality agreements	Retain for a minimum of 5 years AND in accordance with any additional specific requirements	Held by Director of Research on MS Teams/One Drive	Contractual	Appraise and evaluate for secure archiving where relevant otherwise, confidential shredding/secure deletion of electronic records
Individual Level as appropriate	Copyrights records/Trademarks registrations	Retain indefinitely. See also Legal Records for further information.	Held by Director of Research on MS Teams/One Drive	Contractual	Appraise and evaluate for secure archiving where relevant otherwise, confidential shredding/secure deletion of electronic records
Finance	Finance Records: eg original records relating to accounts payable/ receivable; bank records; financial statements, original expenses/travel claim forms and receipts; procurement; payroll	Ref Finance section	Virtual server/MS Teams & Sage	Ref Finance section	Ref Finance Section

¹ Personal data is subject to the Data Protection Acts 1988, 2003 & 2018. Research should undertake, at the earliest opportunity, to anonymise personal data held for the purposes of research.

3. Registrar's Office/Faculty Student Records

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
Registrar's Office	Programme development/ accreditation (no personal data)	Retain indefinitely	Shared Folder/ MS Teams/One Drive	Record of programme validation	Appropriate filing/ archiving
3.1. Student Applications					
Registrar's Office	Records of successful applicants via CAO	Retain for duration of studies ² plus 3 years	Shared Folder/ MAESTRO	Legitimate Interest	Confidential shredding/secure deletion of electronic records
Registrar's Office	Records of successful direct entry applicants (undergraduate and postgraduate) eg applications	Retain for duration of studies [*] plus 3 years	Shared Folder/ MAESTRO	Legitimate Interest	Confidential shredding/secure deletion of electronic records
Registrar's Office	Records of unsuccessful applicants (UG and PG) where no appeal was initiated (appeal process relevant to direct entry applications only)	Retain for 18 months from end of application process. Anonymised applicant data may be retained for as long as required for administrative/statistical use.	Shared Folder/ MAESTRO	Legitimate interest	Confidential shredding/secure deletion of electronic records.
Registrar's Office	Record of applicants who started but did not complete applications or who accepted offer through CAO but did not take up offer	For semester 1 intake retain until October 31 st of the current academic year for Semester 2 intake, retain until January 31 st of the current academic year	Shared Folder/ MAESTRO	Legitimate Interest	Confidential shredding/secure deletion of electronic records.
Registrar's Office	Unsuccessful applicant appeals submissions,	Retain for 5 years following completion of action	Shared Folder/ MAESTRO	Legitimate interest	Confidential shredding/secure

² *Duration of study may be interpreted as a student's completion of discontinuation of their programme of study.

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
	appeal committee reports/outcomes				deletion of electronic records.
Registrar's Office	Overseas recruitment/exchange, agreements, etc (including Erasmus students)	Retain for duration of agreement with agent plus 2 years.	Shared Folder/ MS Teams/ MAESTRO	Legitimate Interest	Confidential shredding/secure deletion of electronic records.
Registrar's Office	* Student examination results and progression data, ordered by student number and result grade (printed in 2 hardback-bound copies)	Retain indefinitely	MIE Archive Room (1 copy), off-campus secure storage (1 copy)	Legitimate interest (back-up of electronic records)	Appropriate filing/archiving
3.2. Undergraduate and Postgraduate Institute Records					
Registrar's Office	Student enrolment record (incl. student name, ID number, contact details on student management system etc)	Retain indefinitely	MAESTRO	Part of Institute Academic Record	Appropriate filing/archiving
Registrar's Office	Records including student registration, grant records, awards/scholarships, extenuating circumstances forms, attendance, leave of absences, deferral, transfer, readmission, exemptions, student status, DS records etc	Retain for duration of studies* plus 3 years provided the data is appropriately secured and subject to restricted access controls	MAESTRO/ MS Forms/ Shared Folder	Legitimate Interest	Confidential shredding/ secure deletion of electronic records
Registrar's Office	Institute correspondence with students	Retain for duration of studies* plus 3 years	MAESTRO/ Shared Folder	Legitimate Interest	Confidential shredding/ secure deletion of electronic records

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
	General UG/PG				
Registrar's Office	Records of student awards, prizes	Retain indefinitely	Shared Folder	Legitimate Interest	Appropriate filing/ secure archiving.
Registrar's Office	Student discipline records 1.) Records relating to minor offences 2.) Records relating to major offences	1.) Retain for duration of study* plus 6 years 2.) Retain for duration of study* plus 25 years (as standard across all HEIs)	Shared Folder	1.) Statute of Limitations 1957 for claims in relation to minor offences is 6 years 2.) Compliance with legal obligation	Confidential shredding/ secure deletion of electronic records
Registrar's Office	Garda vetting records – students: 1) Originating from Garda Vetting Bureau 2) Other Vetting agencies	1) Retain for duration of study* plus 1 yr. 2) Retain for duration of study* plus 1 year	Shared Folder/ MAESTRO	Contractual necessity, consent, compliance, reasons of substantial public interest	Confidential shredding/ secure deletion of electronic records
HR	Garda vetting records – staff	Retain for duration of employment plus 7 years	Personnel file (see section on Personnel Files)	Contractual necessity, consent, compliance, reasons of substantial public interest	Confidential shredding/secure deletion of electronic records
Individual Lecturers (ref Head of Department)	Requests for study extension	Retain for duration of studies* plus 3 years	Virtual server/ MS Teams	Contractual necessity	Confidential shredding/secure deletion of electronic records
Placement/Dean of Graduate Studies	Undergraduate and Postgraduate files not held centrally (ie maintained by offices other than the registrar's office) such as: Records relating to access, disability, co-operative education and	Retain for duration of studies* plus 3 years	Virtual server/ MS Teams	Contractual necessity	Confidential shredding/secure deletion of electronic records

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
	careers, lifelong learning and outreach, references, medical/sick certificates, and institute correspondence with students such as that relating to mature years/Erasmus etc				
Finance Office	Student fees/financial: Records re. student fees, payment records, bank giros	Retain for duration of studies* plus 3 years	Virtual server/ MS Teams & Sage	Contractual necessity/ Consent	Confidential shredding/secure deletion of electronic records
Director of Research/ Library	* Postgraduate Thesis	Retain indefinitely (ref privacy notice)	* 1 copy of qualifying physical theses stored in library and digital copy uploaded to TARA (Trinity's Access to Research Archive)	Theses are retained by consent. Access to qualifying theses is given in the interest of scholarship and research	Appropriate filing/securing archiving.
3.3. Examinations, results, graduation records					
Course Coordinators	Examination papers (and related records ie, recommended marking scheme, suggested solutions etc where relevant)	Retain indefinitely	Virtual server/ MS Teams	Contractual necessity	Appropriate filing/securing archiving
Individual lecturers	* Records which contribute towards module grade, and which have not been returned to students. eg examination scripts, essays, case studies,	Retain for 13 months following deadline for appeal	* Hard copy held by lecturer/ registrars	Contractual necessity	Confidential shredding/secure deletion of electronic files.

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
	cooperative education reports				
Deans of Education	* Final year projects (FYP) and associate records, raw data etc	Retain for 3 years following deadline for appeal (FYP may be held in relevant departmental office or library)	* Hard copy held by lecturer/ registrars	Contractual necessity	Confidential shredding/secure deletion of electronic records
Registrar's Office	* Examination scripts which undergo recheck/appeals procedures. 1.) Original examination script record – recommended that such scripts be retained on file centrally in relevant Head of School Office 2.) Registrar's Office: Examination recheck and appeal form, outcome record	1.) Retain for 2 years after action completed 2.) Retain indefinitely	MAESTRO * Hard copy (Archive Room)/ Shared Folder	Legitimate Interest	1) Confidential shredding 2) Appropriate filing/secure archiving
Registrar's Office	External Examiner Reports	Indefinitely	Shared Folder	Part of Institute Academic record	Appropriate filing/secure archiving
Registrar's Office	External examiner correspondence, meetings, records etc	Retain for current year plus 3 years	Shared Folder/ Email	For reference	Confidential shredding/secure deletion of electronic records
Registrar's Office	Records of module grades	Retain indefinitely	MAESTRO	Part of Institute's Academic Records	Appropriate filing/secure archiving
Registrar's Office	Amendment to marks, published results/grade alteration correspondence	Retain indefinitely	MAESTRO/ Email/ Shared Folder	Part of Institute's Academic Records	Appropriate filing/secure archiving

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
Registrar's Office	Formal broadsheets	Retain indefinitely	MAESTRO/ Shared Folder	Part of Institute's Academic Record	Appropriate filing/secure archiving
Registrar's Office	Examination board meeting records	Retain indefinitely	MAESTRO/Shared Folder	Part of Institute's Academic Record	Appropriate filing/secure archiving
Registrar's Office	Student academic transcript	Retain indefinitely	Maestro	Contractual necessity	Appropriate filing/secure archiving

4. Finance Records

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final disposition
4.1. Accounts Payable					
Finance	* Batches of invoices and vouchers	End of current financial year + 6	* Finance office and off-site archive (Cyclone)	Taxes Consolidation Act 1997 https://www.revenue.ie/en/corporate/documents/records-retention-schedule.pdf https://www.revenue.ie/en/corporate/documents/records-retention-schedule.pdf	Confidential shredding/secure deletion of electronic records
Finance	* VAT Records	End of current financial year + 6	* Finance office and off-site archive (Cyclone)	Taxes Consolidation Act 1997 https://www.revenue.ie/en/corporate/documents/records-retention-schedule.pdf	Confidential shredding/secure deletion of electronic records
4.2. Accounts Receivable					
Finance / Conferencing	Debtors' ledgers	End of current financial year + 6	Finance Drive and SAGE	Taxes Consolidation Act 1997 https://www.revenue.ie/en/corporate/documents/records-retention-schedule.pdf	Confidential shredding/secure

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final disposition
				nue.ie/en/corporate/documents/records-retention-schedule.pdf	deletion of electronic records
Finance	Income listings	End of current financial year + 6	Finance Drive and SAGE	Taxes Consolidation Act 1997 https://www.revenue.ie/en/corporate/documents/records-retention-schedule.pdf	Confidential shredding/secure deletion of electronic records
Finance	Income control accounts	End of current financial year + 6	Finance Drive and Sage	Taxes Consolidation Act 1997 https://www.revenue.ie/en/corporate/documents/records-retention-schedule.pdf	Confidential shredding/secure deletion of electronic records
Finance	Receipts reconciliation	End of current financial year + 6	Finance Drive and SAGE	Taxes Consolidation Act 1997 https://www.revenue.ie/en/corporate/documents/records-retention-schedule.pdf	Confidential shredding/secure deletion of electronic records
Bank Records					
Finance	* Payment approval forms	End of current financial year + 6	Finance Drive; * Copy filed securely in F/O until External audit completed	Taxes Consolidation Act 1997	Confidential shredding/secure deletion of electronic records
Finance	* Bank reconciliation	End of current financial year + 6	Finance Drive; * Copy (filed securely in F/O until External audit completed	Taxes Consolidation Act 1997	Confidential shredding/secure deletion of electronic records
Finance	* Bank statements	End of current financial year + 6	Finance Drive;	Taxes Consolidation Act 1997	Confidential shredding/secure

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final disposition
			* Copy (filed securely in F/O until External audit completed		deletion of electronic records
4.3. Financial Statements					
Finance	* Annual financial statements	End of current financial year +6	Finance Drive; * Copy (filed securely in F/O until external audit completed\0	Taxes Consolidation Act 1997	Appropriate filing/secure archiving
Finance	* Final budget reports	End of current financial year + 6	Finance Drive and SAGE	Taxes Consolidation Act 1997	Appropriate filing/secure archiving
Finance	* Registers maintained in finance office under statute ie register of insurances, mortgages assets	Retain indefinitely in original form	* Finance Office	The Charities SORP (a statement of Recommended Practice) sets out how charities should prepare their annual accounts and report on their finances.	Appropriate filing/secure archiving
4.4. Fixed Assets					
Finance	* Records of institute properties, sale, and purchase	Retain indefinitely in original form. Disposal of Property	* Finance Office Finance Drive	The Charities SORP sets out how charities should prepare their annual accounts and report on their finances.	Appropriate filing/secure archiving
Finance	* Asset register	Retain indefinitely in original form Disposal of Property	* Finance Office Finance Drive	The Charities SORP sets out how charities should prepare their annual accounts and report on their finances.	Appropriate filing/secure archiving

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final disposition
4.5. Agreements					
Finance	* Rental, lease, use, occupancy	6 years from end of lease agreement	* Finance Office/ Finance Drive	Legal obligation	Appropriate filing/secure archiving
Finance	* Capital project records	Retain for 10 years after completion of project and following independent audit sign off	* Finance Office/ Finance Drive	The Charities SORP sets out how charities should prepare their annual accounts and report on their finances.	Appraise & evaluate for archiving where relevant otherwise, confidential shredding/secure deletion of electronic record.
4.6. Procurement					
Finance	* Tender documentation (incl. specifications, quotations, drawings etc)	<p>Core Budgets:</p> <p>Retain for current year plus 6 years and independent audit signed off plus additional time if required by contract.</p> <p>Research Budgets:</p> <p>Retain records linked to research projects for the duration specified in the contract with funding provider or research programme³ and C&AG audit signed off</p>	* Finance Office/ Finance Drive/ secure folder limited access	<p>Successful tenders – duration of project + 2 years</p> <p>Unsuccessful tenders – 2 years from date record created</p> <p>Anonymised tenders (successful and unsuccessful) can be retained indefinitely for contextual analysis, but this needs to be evidenced here if that is the intended approach.</p>	Appraise and evaluate for secure archiving where relevant otherwise, confidential shredding/secure deletion of electronic records
Finance	* Contracts for services (to be held securely by the department who required the goods/services)	Following completion of contract, retain for current year plus 6 years and independent signed off.	* Finance Office/ Finance Drive	Statute of Limitations 1957	Confidential shredding/secure deletion of electronic files

³**IMPORTANT:** Abide by the records retention requirements provided for in the contract with the funding provider/research programme, where relevant.

Owner	General classes of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final disposition
Finance	* Commercial contracts (to be held securely by the department who required the goods/services)		* Finance Office/ Finance Drive	Statute of Limitations 1957	
Finance	Unsuccessful tender documentation	Retain for current plus 2 years	Finance Drive	Public Procurement Guidelines	Confidential shredding/secure deletion of electronic records
4.7. Payroll					
Finance	Pay-sheets, authorisation to deduct tax details of staff, appointment details, pay scales (HR)	Retain on personnel file for duration of employment and 6 years after.	ROS	Contractual necessity	Confidential shredding/secure deletion of electronic files
Finance	Listings/payslips	Retain on personnel file for duration of employment and 6 years after.	ROS	Contractual necessity	Confidential shredding/secure deletion of electronic files
4.8. Records held by divisions/schools/offices etc other than finance/accounts section					
Finance	* Financial – budgets/costings departmental budget records, department revenue/expenses etc	End of current financial year + 6	* Finance Office/ Finance Drive	The Charities SORP sets out how charities should prepare their annual accounts and report on their finances.	Confidential shredding
Finance	* Invoices – copies, if held (originals held in Finance Department)	End of current financial year + 6	* Finance Office/ Finance Drive	Taxes Consolidation Act 1997	Confidential shredding/secure deletion of electronic records

5. HR Records

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
5.1. Recruitment/competition files/assessment boards					
HR	* Unsolicited applications for positions	None	Emails/*hard copy: Virtual server/ MS Teams	Once unsolicited application is replied to, it is deleted if on email or shredded if in hard copy.	Confidential shredding if hard copy. Most applications now received via email.
HR	Vacancy notification Advert copies, job descriptions, selection criteria (with initials of incumbent)	Retain indefinitely	HR Shared Drive/ Email Virtual server/ MS Teams	Legitimate interest	Appropriate filing/archiving
HR	Candidates not qualified or short listed for interview: Cover letters, application forms/CV's etc	12 Months from end of application procedure	HR Drive/ Email Virtual server/ MS Teams	Candidates have 1 year to bring a discrimination claim. If there is an open case records are kept until the case and any appeal is concluded.	Confidential shredding if hard copy. Deletion of soft copy records
HR	Applications and CVs of candidates shortlisted for interview but who did not attend: Cover letters	12 Months from end of application procedure	HR Drive/ Email Virtual server/ MS Teams	Candidates have 1 year to bring a discrimination claim. If there is an open case records are kept until the case and any appeal is concluded.	Confidential shredding if hard copy. Deletion of soft copy records
HR	Candidates short listed and who attend interview but who are not successful or who were successful but do not accept offer	12 Months from end of application procedure	HR Drive/ Email Virtual server/ MS Teams	Candidates have 1 year to bring a discrimination claim. If there is an open case records are kept until	Confidential shredding if hard copy. Deletion of soft copy records

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
				the case and any appeal is concluded.	
HR	Interview board marking sheet Interview board notes Panel Recommendations by Interview Board	12 Months from end of application procedure	On HR Drive/Email Virtual server/MS Teams	Candidates have 1 year to bring a discrimination claim. If there is an open case records are kept until the case and any appeal is concluded.	Confidential shredding if hard copy. Deletion of soft copy records
5.2 Payroll					
HR/ Finance	Pay sheets, authorisations to deduct tax details of staff, appointment details, pay scales	See "payroll" in Finance Section	On HR Drive/Email Virtual server/MS Teams	Contractual necessity	Confidential shredding if hard copy. Deletion of soft copy records
5.3 Personnel Files					
HR	* May include such records such as: <ul style="list-style-type: none"> Personnel contact details Staff identification number Recruitment data Contract of employment (offer of appointment, date appointed) Evidence of education qualifications References Questionnaire on criminal offences Probation forms 	Retain on personnel file for duration of employment plus 7 years.	On HR Drive/*Hard copies or email Virtual server/MS Teams	Legal obligation: Statute of Limitations 1957 for breach of contract claims is 6 years. This period allows for the defence of any claims.	Confidential shredding/secure deletion of electronic files.

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
	<ul style="list-style-type: none"> • Salary rates and increments • Service records • Completion of mandatory training (where relevant) • Termination notices • Training and development records • Safety training records Occupational health reports				
HR	* Employment contract	7 years from date contract ends	On HR Drive/*Hard copies or email Virtual server/MS Teams	Legal obligation: Statute of Limitations 1957 for breach of contract claims is 6 years. This period allows for the defence of any claims.	Confidential shredding/secure deletion of electronic files.
Heads of Department	* Annual leave	Retain locally (not held centrally within HR) for current year plus 3 years.	On HR Drive/*Hard copies or email Virtual server/MS Teams	Legal obligation: Organisation of Working Time Act 1997.	Confidential shredding/secure deletion of electronic records
HR	* Superannuation/retirement records	Retain indefinitely/minimum 99 years.	On HR Drive/*Hard copies or email Virtual server/ Teams	To prove calculation and entitlements in event of query or challenge to entitlement / level of payment and pursuant to Public Service Pensions (Single Scheme and Other Provisions) Act 2012,	Confidential shredding/secure deletion of electronic records

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
				the Pensions Act 1990, the Family Law Acts, the Freedom of Information Act 2014, and the National Archives Act 1986.	
HR	<p>* Discipline records</p> <p>Records relating to disciplinary actions taken against employees eg warnings, suspensions recorded or copy warnings placed on an employee's personnel record etc</p>	<p>Minimum of 6 months, depending on the type of disciplinary record.</p> <p>Verbal, written, final written, disciplinary hearing. Verbal and written warnings may be retained for 6 months. Final written warnings may be removed after 12 months or may be retained for longer. A copy of the disciplinary hearing copy may be retained indefinitely on file.</p>	<p>On HR Drive/ *Hard copies or email</p> <p>Virtual server/ MS Teams</p>	<p>Employment Law / Contractual Necessity / Compliance with a Legal Obligation</p>	<p>Confidential shredding/secure deletion of electronic records</p>
HR	<p>* HR allegations and complaints</p> <p>Written allegations/complaints;</p> <p>Records received/created because of investigating allegations/complaints</p>	<p>Retain in accordance with relevant policy.</p>	<p>On HR Drive/*Hard copies or email</p> <p>Virtual server/ MS Teams</p>	<p>Legal obligation</p> <p>Statute of Limitations Act 1957 and section 60(3)(a)(iv) of the Data Protection Act 2018 where it is in "contemplation of or for the establishment, exercise or defence of, a legal claim, prospective legal claim, legal proceedings or prospective legal proceedings whether before a court, statutory tribunal, statutory body or an administrative or out-of-court procedure". In the case of legal action,</p>	<p>Confidential shredding/secure deletion of electronic records</p>

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
				retain until all appeal options are exhausted.	
5.4. Occupational Health Records, Health, and Safety					
Estates & Conferencing	Incident reports eg accident reports and dangerous occurrence reports (relating to claims correspondence)	Retain for 10 years after date of incident.	Virtual server/ MS Teams	Legal obligation	Confidential shredding/secure deletion of electronic records
Estates & Conferencing	Occupational health reports (including consultant physician's reports) Reports relating to personnel	Retain of personnel file for duration of employment and for 5 years after last pension payment	Virtual server/ MS Teams	Legitimate interest	Confidential shredding/secure deletion of electronic records
Estates & Conferencing	Occupational health reports Reports not relating to specific members of personnel	Retain for 40 years after date of incident.	Virtual server/ MS Teams	Legitimate interest	Appropriate filing/secure archiving and confidential shredding/secure deletion of electronic files
Estates & Conferencing	Safety audits, investigations, and safety evaluation records where cases result in significant changes to policy	Retain indefinitely	Virtual server/ MS Teams	Legitimate interest	Appropriate filing/secure archiving
Estates & Conferencing	Notifications of personal accidents or hazardous situations on campus (which result in injuries/ compensation claims)	Retain for 10 years after date of incident.	Virtual server/ MS Teams	Legitimate interest	
5.5. Employee Relations					

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
HR	* Union correspondence	Retain indefinitely	On HR Drive/ *Hard copies or email Virtual server/ MS Teams	Contractual necessity	Appropriate filing/archiving
HR	* Third party recommendations eg Employment Appeals Tribunal (EAT), Labour Court, Equality Tribunal, Labour Relations Commission	Retain indefinitely if valid rationale for retention and anonymised	On HR Drive/ * Hard copies/ email Virtual server/ MS Teams	Legitimate interest	Appropriate filing/archiving
HR	* Individual industrial relations issues	Retain indefinitely The right to be forgotten must be invoked by an individual. Decide upon the retention period of the data - ie: is there a need to keep it indefinitely or can you retain it for seven years after an individual has left and then delete it along with other employment information	On HR Drive/ * Hard copies/ email Virtual server/ MS Teams	Contractual necessity	Appropriate filing/secure archiving
HR	Leave (annual leave, working time, public holiday)	Retain for 3 years	Virtual server/ MS Teams	Contractual necessity	Confidential shredding/secure deletion of electronic files.
HR	Leave (parental, carers, force majeure)	Retain for 8 years	Virtual server/ MS Teams	Contractual necessity	Confidential shredding/secure deletion of electronic files.
HR	* Employment requests for research leave (originals held by HR). Leave of absence forms copies signed by Dean/Head of School/Area	Retain for current year plus 4 years	On HR Drive/ * Hard copies or email Virtual server/MS Teams	Contractual necessity	Confidential shredding/secure deletion of electronic files.

Owner	General class of Records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
HR	* Employee sick leave forms copies held (original held by HR)	Retain for current year plus 3 years	On HR Drive/ * Hard copies or email Virtual server/MS Teams	Organisation of Working Time 1997	Confidential shredding/secure deletion of electronic files.

6. Classes or Records held by specific Institute/Office areas

Owner	General class of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
6.1. Estates and Facilities					
See also "Finance" and "Procurement" sections					
CFO/ Estates & Conferencing	* Physical planning records, property deeds, campus plans/maps, planning applications/approvals	ONE approved set these documents to be retained in a secure location indefinitely (archived) in the CFO's Office. One complete digital version of these materials is retained online under restricted access by the CFO's Office. Retain indefinitely	* Hard and digital copies	Legitimate Interest / Legal Obligation	Appropriate filing/secure archiving.
Estates & Conferencing	* Maintenance Records (buildings, structure, grounds) 1) Major maintenance, conservation work/fit outs of local, state, or national significance.	1) & 2) 6 years following completion 3) 2 years following completion	* Hard and digital copies	Legitimate Interest / Legal Obligation	Confidential shredding/secure deletion of electronic files.

Owner	General class of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
	2) All other major maintenance work/fit outs 3) Routine maintenance, cleaning work				
Estates & Conferencing	* Records about security operations, list of keys issued, office space	Retain until superseded	* Hard/digital copies Virtual server/MS Teams	Legitimate Interest / Legal Obligation	Confidential shredding/secure deletion of electronic files.
Estates & Conferencing	Inspection records (work equipment etc)	Retain for 5 years from date of inspection	Virtual server/MS Teams	Legitimate Interest / Legal Obligation	Confidential shredding/secure deletion of electronic files.
Estates & Conferencing	Security – CCTV footage	Retain for a maximum of 1 month, unless specifically required for investigation/ security/ safety/ legal purposes	Virtual server/MS Teams	Legitimate Interest / Legal Obligation	Secure deletion of electronic files/overwriting from recording system.
Estates & Conferencing	Safety policies. eg, Safety Statement, Executive Crisis Management	Retain for 5 years after superseded and then destroy	Virtual server/MS Teams	Legitimate Interest / Legal Obligation	Confidential shredding/secure deletion of electronic files.
Estates & Conferencing	Safety promotions, campaigns, etc – eg health promotion plans, workplace campaigns, implementation of protection and healthy workplace arrangements.	Retain for 5 years	Virtual server/MS Teams	Legitimate Interest / Legal Obligation	Confidential shredding/secure deletion of electronic files.

Owner	General class of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
Estates & Conferencing	Fire drill records	Retain for 5 years	Virtual server/MS Teams	Legitimate Interest / Legal Obligation	Confidential shredding/secure deletion of electronic files.
HR	* Safety training records	Retain on personnel file for duration of employment and for 6 years after employment	On HR Drive/ * Hard copies or email	Legitimate Interest	Confidential shredding/secure deletion of electronic files.
Estates & Conferencing	Risk assessment records, eg general, chemical agent, DSE, manual handling, radiation, biological agent, construction, pregnant employee etc	Retain for 5 years after superseded or after activity ceases, whichever relevant	Virtual server/MS Teams	Legitimate Interest / Legal Obligation	Confidential shredding/secure deletion of electronic files.
6.2. Insurance					
CFO	Insurance Policies	Retain for 7 years and C&AG audit sign off – MIE not currently subject to C&AG Audit	Virtual server/MS Teams	Legitimate Interest	Confidential shredding/secure deletion of electronic files
CFO	* Claims correspondence and records providing legal support and representation in dealing with claims by or against the Institute which do not proceed to litigation or settlement by an agreement	Retain for 7 years following settlement OR withdrawal of claim.	* Finance Office Finance Drive	Legitimate Interest / Legal Obligation	Confidential shredding/secure deletion of electronic files
CFO	Claims correspondence and records of litigation with third parties	6 years but anonymised data can be retained indefinitely	Virtual server/MS Teams	Legitimate Interest / Legal Obligation	Confidential redaction

Owner	General class of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
6.3. Library					
Library	Current student/ staff borrower details and active graduate borrowers	Retain for as long as they are a valid member of the library and 1 year after expiry	Liberty LMS (Learning Management System) Borrower data is stored by Softlink in an AWS Data Centre in Ireland.	To allow for the late return of loans and roll the borrower details over to complete	Confidential shredding/secure deletion of electronic files.
Library	Borrower details where book returns/fines remain outstanding	Retain while account remains outstanding.	Liberty LMS Borrower data is stored by Softlink in an AWS Data Centre in Ireland.	Records of outstanding fines/loans are kept in case books are returned or students/staff return to MIE	Confidential shredding/secure deletion of electronic files once fines have been paid/loans returned.
6.4. IT & eLearning Services					
IT & eLearning	IT records of emails, internet & computer usage (student & staff), and backups	Retain emails for maximum of 12 months, or until they cease to be of administrative use. When an individual leaves MIE, retain email account for a maximum of final day of employment + 1 day	Virtual server/MS Teams	Legitimate Interest	Appraise and evaluate for secure archiving where relevant, otherwise confidential shredding/secure deletion of electronic records.
6.5. Institute health centre and student counselling service					
Fairview Medical Centre	Institute health centre – medical records	Retain for duration of student’s studies plus 8 years	Fairview Medical Centre	The retention periods for medical records are taken from the HSE ‘Record retention periods’ (2013). These periods are also in line with recommendations of Medical Indemnity Agencies and the Health Information and	Confidential shredding/secure deletion of electronic files

Owner	General class of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
				Quality Authority (HIQA).	
Fairview Medical Centre	Institute health centre – mental health records	Retain for the duration of the student’s studies plus 20 years	Fairview Medical Centre	Ref HSE ‘Record retention periods (2013); Medical Indemnity Agencies and the Health Information and Quality Authority (HIQA).	Confidential shredding/secure deletion of electronic files
Student Counselling Service	Student counselling service – student records, case notes, assessment reports, recommendations	Retain for the duration of the student’s studies plus 20 years	Student Counselling Service; Fairview Medical Centre	Ref HSE ‘Record retention periods (2013); Medical Indemnity Agencies and the Health Information and Quality Authority (HIQA).	Confidential shredding/secure deletion of electronic files
6.6. Public Affairs and Communications					
Office of the President	Institute press releases	Retain indefinitely	Virtual server/MS Teams	Not personal data	Appropriate filing/secure archiving.
Office of the President	PR Campaigns	Retain indefinitely	Virtual server/MS Teams	Not personal data	Appropriate filing/secure archiving.
Office of the President	Formal records of ceremonies/functions ie honorary conferring’s VIP visits, presidential inaugurations etc (eg Photographs, audio-visual recordings, programmes of events as relevant	Retain indefinitely	Virtual server/MS Teams	Legitimate interest Invitations to such events should include fair notice that audio recording or photographs will be taken.	Appropriate filing/secure archiving.

Owner	General class of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
6.7. Information Compliance					
CFO	Ethics in public office statements of interest (Designated directors & designated position holders)	In line with GB Minutes, these data should be scanned and retrained in digital forma with restricted access to the President's Office. Retain for 15 years	Virtual server/MS Teams	Legitimate interest.	Confidential shredding/secure deletion of electronic files
FOI Officer	FOI/Data Protection: decisions on requests	Retain for 7 years	Virtual server/MS Teams	European Data Protection Board guidance.	Appropriate filing/secure archiving
FOI Officer	FOI/Data Protection: other records relating to requests	Retain for 7 years after final action completed.	Virtual server/MS Teams	European Data Protection Board guidance.	Confidential shredding/secure deletion of electronic files

Owner	General class of records held	Default retention period	Where the data is stored	Rationale for the retention period	Final Disposition
6.8. General Administration					
Education Office	Records of internal/ operational meetings (eg board/ department/ committee meetings) to include agenda, minutes, related documents	Retain for 5 years after relevant action completed	Shared Folder or MS Teams/One Drive	Legitimate Interest	Confidential shredding/secure deletion of electronic records
Education Office	Staff attendance sheets	Retain for one year following current annual leave year	Locally on individual drive	Contractual necessity	Confidential shredding/secure deletion of electronic records
Education Office	Records of individuals' contact details for various	Until they cease to be of administrative use	Education Office shared folder and/or	Legitimate interest	Confidential shredding/secure

	purposes, eg invitations for events, mailshots, assigning lockers, social club		individual drive and/or paper copy in Education Office		deletion of electronic records
Education Office	Scanned examination papers for External Examiners' review	End of academic year	Education Office shared drive	Contractual necessity	Confidential shredding/secure deletion of electronic records
Education Office	Summer course applicant details	Indefinitely	Shared drive	Contractual necessity	Confidential shredding/secure deletion of electronic records
Education Office	Student attendance records, including medical records	Duration of studies plus 3 years	Shared drive, Maestro. email	Contractual necessity	Confidential shredding/secure deletion of electronic records
Education Office	Records relating to Erasmus programme, including application form, medical information, examination results	Duration of studies plus 3 years	MS Teams, email, locally on individual drive	Contractual necessity	Confidential shredding/secure deletion of electronic records
Education Office	* School Placement (SP) records	SP records (hard copy): 13 months following student's graduation; SP results transcripts (soft copy): retain indefinitely	SP records (hard copy): records: Education Office SP results (soft copy) transcripts: MS Teams/One Drive	Legitimate interest	Confidential shredding/secure deletion of electronic records
Education Office	Records of elections to Academic Council and Governing Body	Retain for current year, or until they cease to be of administrative use	Ballot papers are retained only until result has been independently verified	Public Interest / Official Authority vested in Controller	Confidential shredding/secure deletion of electronic records
Education Office	Off-campus accommodation list	Review annually. Retain for 1 year	Desktop PC at reception desk	Legitimate interest	Data to be deleted

Definitions

Appropriate Filing: Appropriate filing and archiving can be understood as putting documents in locked cabinets if they are in physical format in locked rooms and ensuring only particular persons have access to them. Digital records should exist in a safe environment/private server, be accessed only through a VPN and access should be tiered according to rank.

Claims made by unsuccessful applicants HR: 12 months from end of application process + 6 months in case of Equality Tribunal claim. In case of litigation/criminal investigation, retain relevant extract in case file until all appeal options are exhausted, as allowed under section 60(3)(a)(iv) of the Data Protection Act 2018