

Universities and University Medical Centres 2020 Retention and Disposition Schedule

Confirmed in the Government Gazette no. 5156, dated 29 January 2020

Instrument for the selection – for destruction or permanent retention - of administrative records of the processes of public and special universities and university medical centres from 2020

Reading guide

This is the Universities and University Medical Centres 2020 Selection List. The list shows retention periods for information objects that are present, or could be present, at universities and university medical centres.

The selection list consists of four parts:

Chapter 1 looks at the background to the selection list, how it works, and how it is applied.

Chapter 2 contains the processes and their related information objects and retention periods.

An explanation of the choices made and the backgrounds of a number of the retention periods listed in Chapter 2 is given in Chapter 3. This concerns general explanatory notes such as the influence of the General Data Protection Regulation and specific notes if there is insufficient space in the 'Comments' fields for the processes in Chapter 2.

The appendix has an overview of all the registers to be kept, of all the legislation involving retention periods, and an explanation of the structure of the Universities of Applied Sciences selection list, which served as a source for this selection list.

Contents

Reading guide	2
I. Introduction	5
1.1 The Universities and University Medical Centres Selection List	5
1.2 Scope.....	6
1.3 Dates on which new selection lists enter into force, and on which old selection lists cease to apply	7
1.4 Approach and justification.....	7
1.5 Brief history and duties of universities and university medical centres	8
1.6 Structure and description of the processes	9
1.6.1 The description elements.....	10
1.6.2 Using the selection list.....	12
1.6.3 Criteria for valuation	13
1.6.4 Destruction exemptions	15
1.6.5 Evaluation.....	17
II. The processes.....	18
2.1 Management and structure of the organisation	18
2.2 Teaching - development and implementation of policy	26
2.2.1 Development of education policy	26
2.2.2 Teaching – development of teaching	28
2.2.3 Teaching - implementing teaching	32
2.2.4 Teaching – Assessment.....	34
2.3 Research	39
2.4 Valorisation.....	42
2.5 Patient care - development and implementation of policy.....	43
2.6 Operational management - development and implementation of policy.....	46
2.6.1 Operational management.....	46
2.6.2 Student administration.....	48
2.6.3 Personnel.....	52
2.6.4 Organisation	56
2.6.5 Finances.....	63
2.6.6 Communication	66
2.6.7 Accommodation	67
2.6.8 Protection of personal data.....	71
III. Explanatory notes and justification.....	73
3.1 Objectives and users	73
3.2 Use of the terms 'archive' and 'processes'	73
3.3 Permanent retention	74

- 3.4 Explanatory notes for retention periods and compiling of files for teaching and assessments ..74
 - 3.4.1 Retention period for examinations and final projects 74
 - 3.4.2 Compiling of files for examinations..... 76
 - 3.4.3 Examinations and degree certificates 77
 - 3.4.4 Longer retention of final projects..... 78
- 3.5 Explanatory notes for retention periods for research, medical data, and valorisation78
 - 3.5.1 Research 78
 - 3.5.2 Medical data..... 79
- 3.6 Other explanatory notes to specific processes and information objects80
 - 3.6.1 Accommodation 80
 - 3.6.2 Meetings..... 80
 - 3.6.3 Participation in decision-making 81
 - 3.6.4 Committees, working groups, and steering committees 81
 - 3.6.5 Quality assurance 82
 - 3.6.6 Internal internships 82
 - 3.6.7 Financial documentation..... 82
 - 3.6.8 Providing information and making announcements..... 82
 - 3.6.9 Collaboration 83
- 3.7 Registers and legislation83
 - 3.7.1 Registers 83
 - 3.7.2 Legislation..... 84
 - 3.7.3 General Data Protection Regulation 84
- 3.8 Abbreviations85
- Appendix 1 Registers87
- Appendix 2. Retention periods in legislation (medical legislation).....88
- Appendix 3. Report of National Archives consultation meetings95
- Appendix 4. Approach and justification of the Universities of Applied Sciences selection list 2016106

I. Introduction

1.1 The Universities and University Medical Centres Selection List

The purpose of valuating, selecting, and acquiring public records is to bring together and secure sources that enable individuals, organisations, and social groups to discover their history and to reconstruct the past of state and society, and how they interact. To that end, the public records (or sections thereof) being secured should be:

- a. representative of what aspects of society have been recorded;
- b. representative of the activities of members (people and organisations) of a society;
- c. regarded by observers as important, special, or unique, because they reflect important, special, or unique social developments, activities, people, or organisations at a particular time.¹

A selection list is one of the ways of achieving the aforementioned objective.

Pursuant to the Public Records Act 1995, government bodies must have a selection list. A selection list states how long information objects must or may be retained. A selection list offers a retention strategy that guarantees organisations the possibility of asserting their rights, or for supporting citizens seeking to assert their rights or who are looking for evidence. Additionally, a selection list shows the information objects that an organisation seeks to retain, as part of its social function, in order to enable future historic research into its activities and operations. A selection list is therefore not just applicable to government organisations; the semi-public and private sectors also benefit from overviews that show how long they must or may retain their business information.

With a view to efficiency of the valuation and selection process, joint selection lists may be created for organisations with the same mission and functions. Obvious examples of this are the selection list for municipal and intermunicipal bodies of the Association of Netherlands Municipalities (VNG) and the Universities of Applied Sciences 2019 update selection list of the Netherlands Association of Universities of Applied Sciences. University medical centres, for example, used two different selection lists. For this reason, the University Platform for Information service provision and Record management (UPIR) has drawn up this Universities and University Medical Centres Selection List for all affiliated universities and university medical centres (UMCs).

Universities and university medical centres have been part of Dutch society for a long time and therefore have a responsibility to society to preserve public records that provide information about the historic developments of universities, UMCs, and Dutch society. The selection list determines which historic and scientific information of value should be preserved permanently, and which should be destroyed after a certain period of time.

The prevailing Basic Selection Documents (BSD) for universities and UMCs were set in 2009 and 2013 respectively. Changes to legislation have resulted in new retention periods that do not feature in these selection documents. These BSDs should therefore be amended.

There was also dissatisfaction about the structure of the existing BSDs: the actions² were set out on an actor-by-actor basis. If multiple actors were involved in one particular action, the action itself appeared on multiple occasions in the BSD with retention periods that were not always the same. This led to a widespread lack of clarity and, eventually, to a desire for the selection list to be structured differently.

¹ Letter to the House of Representatives from the Ministry of Education, Culture, and Science and the Ministry of the Interior and Kingdom Relations regarding the strategy for selecting public records, 17 December 2010.

² Action: Complex of activities, aimed at creating a product, that an actor carries out to fulfil a task or on the basis of a power vested in them.

Process: The execution of the task or action, on the basis of which archive documents are received by an organisation or are drawn up, and allocated to this according to their nature. This refers to the processes by which an organisation carries out all the tasks assigned to it.

In concrete terms, this universities and university medical centres selection list has an overview of processes, rather than actions, that take place in a university or a university medical centre. Each process is accompanied by explanatory notes, an actor, a basis, a valuation, possible information objects, and, if necessary, a reasoned retention period.

1.2 Scope

The new selection lists applies to every university and university medical centre that is subject wholly or partly to the Public Records Act.

The following universities and university medical centres are affiliated to this selection list: University of Amsterdam, Amsterdam University Medical Center, Vrije Universiteit Amsterdam, VU University Medical Center, Protestant Theological University, Delft University of Technology, Eindhoven University of Technology, University of Twente, University of Groningen, University Medical Center Groningen, Leiden University, Leiden University Medical Center, Maastricht University, Maastricht University Medical Center+, Radboud University Nijmegen, Radboud University Medical Center, Erasmus University Rotterdam, Erasmus University Medical Center, Tilburg University, Utrecht University, University Medical Center Utrecht, Wageningen University & Research, and the Open University.

Specific provisions for special universities and special university medical centres

In performing their duties, special universities and special UMCs, as private-law organisations, have a public authority function only in relation to a limited number of processes, and only these are subject to the provisions of the Public Records Act. This concerns the following universities and UMCs: Vrije Universiteit Amsterdam, VU University Medical Center, Protestant Theological University, Radboud University Nijmegen, Radboud University Medical Center, and Tilburg University.

The public authority functions of the special universities and special university medical centres relate to whether or not students obtain a degree. The archive documents relating to these functions come within the scope of the Public Records Act 1995. These functions are carried out in the following processes:

- [Process 61](#): Graduation by students: administering examinations and issuing degree certificates and university diplomas (see below);
- [Process 65](#): Appeals concerning the issuing of degrees, directed at the Higher Education Appeals Board (*College van Beroep voor het Hoger Onderwijs*, CBHO);
- [Process 123](#): Objections: disputes (objections) directed at the board, concerning the issuing of degrees.

Public universities and UMCs are subject to the selection list in its entirety. The special universities and UMCs should have an officially approved selection list only for the aforementioned three processes and should therefore always observe the retention periods for these processes that are stated in this selection list.

Given that special universities and UMCs comply with this selection list, it is recommended that they also observe the retention periods for the other processes described. In cases where they do not wish to do so, they may set their own retention periods.

1.3 Dates on which new selection lists enter into force, and on which old selection lists cease to apply

This selection list enters into force on 1 January 2020 and applies for a maximum of twenty years from its publication in the Government Gazette. The following selection lists shall cease to apply on 31 December 2019:

- Basic Selection Document Academic Education 1985- (BSD). Government Gazette nos. 12639, 12650, 12649, 12657, 12661, 12665, 12669, 12643, 12646, 12651, 12656, 12664, 12670, dated 26 August 2009 and Government Gazette no. 36532, dated 19 December 2014;
- Basic Selection Document Public and special university medical centres 1985-. Government Gazette no. 4469, dated 22 April 2013.

The discontinued BSDs remain valid for information objects dating between 1 January 1985 and 31 December 2019. Information objects dating from 1 January 2020 or later are subject to the new selection list.

1.4 Approach and justification

The Universities and University Medical Centres 2020 Selection List has been developed under the responsibility of the UPIR, specifically by a team of the Acquisition, Selection, and Valuation working group, as part of the UPIR. The team consisted of Manuël Boessen (Maastricht University), Eveline Bregonje (University of Amsterdam), Annemiek Hendriks (Eindhoven University of Technology), Siebrig Laning (University Medical Center Groningen), and Homme Martinus (University of Twente).

The secretarial duties for the project were carried out by VHIC consultancy firm. The other participants in the Acquisition, Selection, and Valuation working group (ASW)³ had a sounding board function.

This selection list is based on the 2013 Universities of Applied Sciences selection list, 2016 update. The Universities of Applied Sciences selection list was compared with the BSD Academic Education, the BSD Public and special university medical centres and the Vrije Universiteit Amsterdam selection list.⁴ The research results have been processed and commented on by the members of the working group on several occasions.

Regarding the structure and approach of the Universities of Applied Sciences selection list, reference is made to the version of the Universities of Applied Sciences selection list of 2016, contained in [Appendix 4](#)⁵.

A completely different structure has been used for this selection list to that of the BSD Academic Education 1985-2019 and the BSD Public and Special University Medical Centres 1985-2019. Rather than the starting point of policies involving actions and actors, the emphasis in the selection list lies on work processes. It has been decided that responsibility for the process should rest as high up in the organisation as possible. This means that processes feature in the selection list only once. This contrasts with the BSDs, in which actions were described on an actor-by-actor basis,

³ Those represented in the ASW are: University of Amsterdam, Vrije Universiteit Amsterdam, Utrecht University, Leiden University, University of Groningen, Delft University of Technology, Eindhoven University of Technology, Wageningen University & Research, Radboud University Nijmegen, Maastricht University, Erasmus University Medical Center, University of Twente.

⁴ This selection list has been drawn up by the Vrije Universiteit Amsterdam itself as a practical version of, and supplement to, the BSD for universities 1985-.

⁵ For the complete version, see <https://www.vereniginghogescholen.nl/kennisbank/vereniging-hogescholen/artikelen/selectielijst-hogescholen-aangepast-aan-avg>

and consequently were liable to appear in the selection list multiple times if multiple actors had a part to play in any single action.

Another innovation is that this selection list is not limited to the policy fields of 'education' and 'patient care', as is the case with the BSDs, but also includes those of 'research' and 'valorisation'. Finally, account has been taken of new legislation (such as the General Data Protection Regulation) when determining the retention periods, and all new retention periods have been reassessed.

The draft selection list was submitted to the National Archives in November 2019, with a request to formally adopt the selection list. The draft was presented to an external expert in September 2019, in accordance with Section 3, under d, of the Public Records Decree 1995. A report was drawn up of the subsequent consultation meetings regarding the selection list in October 2019 (see [Appendix 3](#)).

From 2 December 2019, the selection list was available for public viewing for six weeks at the registration counter of the study room and on the National Archives website, an announcement of which was made in the Government Gazette. No comments were received from organisations, including historic organisations, or individual citizens.

The selection list was subsequently adopted by the general state archivist on behalf of the Minister for Primary and Secondary Education and Media on 22 January 2020. The decision was published in the Government Gazette (no. 5156, dated 29 January 2020).

1.5 Brief history and duties of universities and university medical centres

Universities

The oldest university in the Netherlands, Leiden University, was founded by William I, Prince of Orange, in 1575. Before that, people went to the university in Leuven or otherwise to those in Paris, Cologne, or Oxford. Since then, various other universities have come (and gone again). During the 2013-2014 academic year, there were over 250,000 students at fourteen universities. Universities carry out scientific research, provide academic degree programmes, and award academic degrees. In recent years, universities and UMCs have increasingly taken on the important task of contributing to the knowledge society by creating innovation and by sharing knowledge (valorisation).

Universities in the Netherlands are either public or special. Public universities are those set up by the government. They have legal personality, which means they can be described as public-law organisations with full (attributed) legal capacity. The special universities have legal personality governed by private law – that is, they are foundations (Catholic University Brabant, Catholic University Nijmegen), associations (Vrije Universiteit Amsterdam), or religious organisations (Protestant Theological University).

Public and special universities alike are governed chiefly by the Higher Education and Research Act (WHW) as a legal basis.

Each university has an executive board consisting of the rector magnificus and one or more directors. The boards are accountable to the relevant supervisory board. The members of the supervisory boards are appointed by the ministry under which the university in question⁶ falls. If a university consists of more than one faculty, there are faculty boards for each one. The faculties themselves may consist of multiple departments.

At every level, students and employees have the opportunity to contribute their own ideas and input for the policies of their university. The bodies through which this occurs are known as councils. There is usually a student council, a university council, and faculty councils.

As laid down by the WHW, each degree programme must have its own examinations board. An examinations board is a committee at an education institution that determines whether students

⁶ This is usually the Ministry of Education, Culture and Science, but Wageningen University & Research, for example, comes under the Ministry of Economic Affairs.

have met the conditions for receiving a degree certificate. The committees assess the combination of courses of each student vis-à-vis the learning outcomes of the programme in question, check the level of difficulty of the tests and examinations, and determine the criteria for passing examinations and issuing degree certificates. The examinations boards also decide whether students are eligible for exemption from certain courses, on the basis of previous work experience for example, or exams passed elsewhere, and give permission to students seeking to embark on non-regular degree programmes. In the case of degree programmes subject to special requirements, such as binding study advice, it is the examinations boards that decide whether students have met them. The examinations boards operate independently of their respective executive boards.

Universities and UMCs work as closely as possible in partnership with organisations in both the public and private sector in order to share knowledge with a wide audience. Knowledge is also used for meeting economic objectives. Universities launch or support start-ups and help secure patents.

University Medical Centres

There are currently eight teaching⁷ hospitals in the Netherlands known as University Medical Centres (UMC). The foundation for the creation of UMCs was laid with a change to the Higher Education and Research Act (WHW) in 1990. UMCs resulted from collaborative partnerships between hospitals and universities that generally led to mergers and, ultimately, to UMCs. UMCs carry out their public tasks as autonomous administrative authorities and have public authority. The public teaching hospitals were granted legal personality in 1969, and the University Education Act was amended accordingly. A UMC is a single complex of a hospital with just one faculty, that of medicine.

Whereas universities are responsible for research and teaching policies, UMCs are responsible for patient care and for training medical and healthcare specialists. Unlike general hospitals, the core task of a UMC is that of highly-specialised healthcare – specialised referrals and specialised clinical care for the purpose of medical research, as well as the development of medical technologies and the training of students as medical and healthcare specialists, and refresher training for specialists. It is for this reason that some UMCs come under both the WHW and the Adult and Vocational Education Act.

UMCs also concentrate on scientific medical research and the development of new medical technologies.

Each UMC is governed by a board of directors. Depending on whether a UMC is 'special' or not, there may also be a supervisory board, to which the board of directors is accountable. The various boards advise the board of directors of the direction the organisation should be taking. UMCs also have multiple representative advisory bodies (councils) that give recommendations on or approval to the organisation's policies. Patients, for example, are represented by a patient council, there may be a UMC council, a works council for employees, and an advisory council of and for nursing staff and paramedics. Whereas universities generally come under the Ministry of Education, Culture and Science, UMCs are often part of the remit of the Ministry of Health, Welfare, and Sport.

1.6 Structure and description of the processes

Structure

The structure of this new selection list is based on that of the 2013 Universities of Applied Sciences selection list, 2016 update.

The processes in the Universities and University Medical Centres Selection List are grouped in a main structure, and are generally distinguished as follows:

⁷ Throughout this Retention and Disposition Schedule the term teaching is used to describe: "what academic staff engage in; what a university engages in vis-à-vis its students".

- Managing the universities and UMCs;
- Teaching, research, and valorisation policy development and implementation;
- Patient-care policy development and implementation;
- Operational policy development and implementation.

This structure has been drawn up on the basis of the main tasks of universities and UMCs and the process models of a number of individual organisations, among other things. For each of the aforementioned categories, a brief description is given of the content and the sequence of the processes.

Universities and UMCs may differ significantly in terms of their size and organisational structure. For this reason, not every process that features in this selection list is directly applicable to every institution that uses the list; each institution will have to interpret the processes in its own way. Also, processes will be less immediately recognisable because of the general approach of the selection list, which itself is due to the differences between institutions (see the section below). Given that the selection list has to be applicable to every university and UMC, no distinction is made between public universities and UMCs on the one hand, and special universities and UMCs on the other.

Inclusion of processes in the selection list

Processes in the selection list are described in as generic terms as possible. In a number of cases, it was necessary to describe certain processes more specifically. Possible reasons were:

- the basis of the process is referred to specifically in legislation, especially the WHW;
- retention periods of more specific processes differ from generic processes, such as *the drawing up of personnel policies versus the drawing up of policies generally*;
- the process would not be recognisable.

Processes are always described from the perspective of the organisation. The verb used with a process determines the perspective of the organisation. This could result in similar processes having separate descriptions. For example, there is a process in which an organisation applies for a grant and one in which the organisation awards a grant. The subject is the same, but the verbs used – and therefore the perspectives – are different, which means that different processes are included.

1.6.1 The description elements

For the description of the processes in the selection list, a standard collection of description elements are used:

- **Number:** a sequential number for the process.
- **Core description:** a concise name for the process, to be used as its short title.
- **Process:** A description of the process content and its demarcation. A process concerns the whole life cycle of one or more information objects – in other words, the creation of, modifications to, and expiry of the information object come under the process. Evaluations are also part of the process.
- **Actor:** the actor who is chiefly responsible for implementing the process. Because of the aim of having a process-oriented approach, a process may have multiple actors. In such cases, the actor shown is the one who, in practice, can be regarded as having chief responsibility, under the administrative responsibility of the institutional management. With universities and UMCs, there are basically only five actors: the institutional management, the representative advisory bodies⁸, the boards of organisational units⁹, the examinations board, and the supervisory board. This does not mean that the selection list gives any indication of the allocation of powers at a university or UMC. Universities and UMCs are themselves responsible for linking the selection list to their own information management.

⁸ The programme committees are regarded as representative advisory bodies.

⁹ Organisational units are defined as faculties and divisions alike.

- **Basis:** The reason (basis) why the process is carried out, as found in legislation or sectoral quality standards.¹⁰ Specific internal (local) rules and regulations are not included as they may be outdated and involve very specific processes that do not apply to every university or UMC. The basis is also used for some work processes for indicating legislation that contains specific retention periods. The retention periods should always be regarded as 'absolute' (see [Type of Valuation](#)). This legislation is therefore included in Appendix 2. If there is no legal basis for a process, the basis is always 'internal'. This means that there are internal policies on the basis of which a process is carried out.
- **Information objects** (see also the comment under [1.6.2 Using the selection list](#)): the information objects (information objects described according to function, regardless of their form) received or drawn up by a university or UMC when carrying out the process. These information objects will vary, depending on the nature and practices of each individual institution. As with actors, the information objects should be seen here as the largest common denominator for every university and UMC. This selection list therefore also refers to information objects that organisations should keep if said objects (or similar ones) are created in this process.
It is likely that other types of information object will be created in the process, which are designated as 'correspondence' or 'other' in other selection lists. This has been avoided in this selection list. The 'clean up'¹¹ (see also [Section 1.6.2](#)) of files or cases is not catered for in this selection list either.
- **Valuation:** the decision on whether to retain information objects permanently as part of the process, or to destroy them after a period of time. 'Retention' refers here to permanent retention; see [Section 1.6.3](#) for the criteria mentioned after 'Retention'. 'V' refers to destroying in due course, with a retention period added. The added retention period shows how long the information objects from the process in question should be preserved.
- **Other valuation:** the processes in which the information objects referred to in this field are created are given a valuation that deviates from the retention period; this is stated under 'Valuation'. Information objects with an exceptional retention period are also included under the 'Information Objects' description element in order to give a complete picture of the documentation that is relevant to the process. Here, too, a period is given for the negative result of a process, such as when a request is rejected or when a process did not go ahead.
- **Type of valuation:** The retention period shown with every process is designated either 'indicative' or 'absolute'.
Public universities and UMCs must always observe every retention period mentioned in the selection list. Because the selection list has been officially laid down for these organisations, they may not deviate from the retention periods stated.

In the case of special universities and UMCs, if a retention period is absolute, the information objects in the process may not be kept for longer or shorter (depending on their basis) than what is stated in the selection list. Absolute retention periods are derived from the fact that the process contains information objects that must be destroyed by law.

Indicative retention periods are derived from legislative requirements by which information objects must be retained for a certain amount of time, or are related to this. The processes relating to enrolment and learning assessments are an example of this. Most of these processes are not subject to legal requirements, but the period may be derived from the period selected for related processes. Indicative retention periods are also connected to destruction processes for which there is no clear retention period or for which no retention

¹⁰ The legislation referred to as the basis does not necessarily include retention periods. Sectoral quality standards are rules that apply only to the sector.

¹¹ Clean up: the destruction or deletion of information objects from a case or a file when said case or file is transferred. This concerns information that is not needed for reconstructing cases, such as duplicates, drafts, or information objects with little information.

period could be inferred from other processes. For these processes, retention periods have been chosen on the basis of a risk analysis – private institutions may regard this as a reasoned recommendation.

Section [1.6.3](#) and the explanatory notes to the selection list look at the desirability of permanently retaining university and UMC information objects in more detail.

- **Comments:** This is where comments of interest are posted with a process, such as a more detailed explanation of the retention period, any deviating retention periods of information objects, references to other processes, or points for attention in relation to the compiling of files. The possible impact of the General Data Protection Regulation is also included here.

1.6.2 Using the selection list

Absolute or indicative

The selection list contains retention periods that are designated as *absolute* or *indicative*. An explanation of these categories can be found in Section [1.6.1](#).

Risk analysis

Many retention periods of destruction processes are determined on the basis of a risk analysis. Risk analyses involve looking at the risks to which an organisation is exposed if information is kept for too long or too short a time. Legislation is one of the starting points here. For example, retaining personal data for too long a time may be in breach of the General Data Protection Regulation, while retaining financial data for too short a time may lead to problems with the Tax and Customs Administration. The assessment of these risks serves as the basis for determining the retention period. Obviously, retention periods stipulated by law are copied and do not form any part of a risk analysis.

Type of information objects

Archive documents/documentation are referred to as information objects¹². This refers to information or data (information objects), regardless of what form it takes (paper or digital), including the related metadata. Information objects are therefore not only documents (digital or otherwise), but also the data that is recorded about these documents (metadata), and data that is recorded digitally. Information objects should be regarded as information that an organisation needs for its operations, accountability, or evidence, including the context of the information. The starting point for the selection list is therefore no longer documents or archive documentation, but information objects, regardless of what form they take.

Archivable information objects are:

- information objects that have been received or drawn up, with a function in a process or other activity, registered with their related context and thereby usable for accountability and evidence purposes;
- information objects received or drawn up by the university or UMC, regardless of what form they take, and allocated to them according to their nature;
- information objects, regardless of what form they take and with a similar purpose, received or drawn up by organisations or persons whose rights or functions have been transferred to the university or UMC;
- information objects which, regardless of what form they take, have been added to an archive depository as a result of agreements with or decisions by institutions or persons, or otherwise;
- reproductions, regardless of what form they take, that substitute the aforementioned objects.

¹² Definition of 'information object': An independent collection of data with its own identity. An [information object](#) is a collection of related data that are treated as a single unit.

Information objects mentioned

The information objects referred to in this list are those that *could* occur in a process. If an information object does not feature at a university or UMC (or does not feature in a specific case), the institution in question is not obliged to create or retain these information objects. The external expert has not carried out a test to see whether the list of information objects is exhaustive.

If information objects occur in multiple processes, the longest retention period given for these information objects (including metadata) should be observed.

Cleaning up

This process-oriented 2020 Selection List means that every information object that has been established in the context of the execution of a case has been assigned a valuation based on the result. It is no longer possible, on the basis of this selection list, to separately name document categories that form part of a broader type of process, such as the preparations for drawing up policies. If desired, in the event of a case file, it is possible to make a distinction between the information objects that are important only for a short time and those that must be retained in accordance with the retention period stated in the selection list. Information objects that are not essential for reconstructing the case in question may be 'cleaned up'. This could apply to a case file on the development of a policy plan, for example, where information objects such as rough notes, working documents, duplicate copies, and invitations to meetings from the previous inventory phase or consultation phase are deleted completely or partly on the basis of an analysis. However, such cleaning up is not compulsory.

1.6.3 Criteria for valuation

Valuation

In carrying out their core tasks, universities and UMCs fulfil an important social need. The information objects in which these core tasks are reported in outline therefore have historical and applied scientific value. The processes from which the information objects originate should be retained permanently according to this selection list, based on five general selection criteria formulated in the system-analysis method (SA) of the National Archives:

Selection criterion	Explanation
<p>SA-B1 Processes related to decision making</p>	<p>This is defined as the archive items of the most important decision-making bodies and routes that relate to the core tasks and goals of the organisation and the structure of the organisation.</p> <p>This could include structural consultation meetings at the highest level in the organisation, but also crucial decision-making processes that take place in other ways, such as through official 'gateways'.</p> <p>Not all decision-making bodies are designated for retention. Only decisions taken at the highest political and official levels are designated for permanent retention.</p> <p>In general, decision-making bodies are designated for permanent retention if:</p> <ul style="list-style-type: none"> • they are important for the purpose of reconstructing the actions and operations of the organisation in broad terms; • an important information hub is involved. <p>Please note: In the case of meetings, the decisions taken can only be reconstructed if the documents on the basis of which such decisions were taken have been retained as part of the process. It is precisely the presence of these documents that means a meeting can be regarded as an information hub.</p>
<p>SA-B2 Processes that relate to decisions that extend beyond the organisation</p>	<p>Part of the decision-making process lies outside the organisation, but is prepared inside the organisation or administered by it. Examples include:</p> <ul style="list-style-type: none"> • consultations between organisations: when the organisation carries out the secretarial activities and it involves high-level consultations, they are designated for permanent retention. • international decision-making: the preparations for decisions in the Benelux countries, EU, NATO, and UN are designated for retention if an organisation is responsible for coordinating the input by the Netherlands. NB: the meeting materials of some international bodies may not be retained.
<p>SA-B3 Processes related to crucial (temporary or otherwise) developments or procedures</p>	<p>This is defined as processes (temporary or otherwise) that are regarded as crucial because they give a good picture of new initiatives, changes in course, and important developments.</p> <p>Possible examples include policy in certain areas (core tasks), legislation in certain areas, special committees and working groups, restructuring processes, etc. Executive and repeated processes will not be considered for retention.</p>
<p>SA-B4 Processes related to reporting and planning</p>	<p>Reports and plans that give a good picture of the development of and planning for one of the policy areas of the organisation or the development of the organisation itself.</p> <p>Much is often recorded in reports and plans about the current functioning, structure, and aims of the organisation in an aggregated form. Not every report or plan is designated for retention – only those that relate to the whole or a large part of the organisation, to a core task, or to a major policy area. A decision should be taken on whether only the end product should be designated for permanent retention or the whole process. In particular, the process may be of importance with regard to planning for certain policy areas.</p>

<p>SA-B5 Processes related to key registers</p>	<p>This is defined as the large-scale registers that form a valuable source for future historic research, statistical analysis, etc.</p> <p>Key registers are always designated for retention. Other registers may contain such valuable and useful information that it makes them eligible for permanent retention as well.</p> <p>Whenever it concerns registers that include personal data, it should be decided in advance whether the data is to be retained in its existing form or anonymised or pseudonymised. This depends on other legislation. The fact that a register contains personal data is not in itself a reason to destroy it. However, it is a reason to be very careful when making such information accessible.</p>
---	--

For the other retention periods, the following reasoning can largely be applied:

- one or two years for limited evidentiary interest;
- two years, post-termination of enrolment, for data about students, in case they re-enrol a short time later;
- five years in the case of information objects that give grounds for legal claims;
- seven years for information objects that could be involved in accreditation (based on the six-yearly degree programme accreditation, with one extra reserve year);
- seven years for information objects from financial reports;
- ten years for information objects with a weightier legal basis, which the institutions are obliged to retain;
- fifty years for information objects that give a graduate the right to their degree or first-year diploma.

If a period or reason other than those listed above is used, an explanatory note is added in the comments with the relevant process.

Financial documentation

Specifically in the case of financial reporting, account should be taken of financial data that relate to commercial real estate (nine years, pursuant to Section 34a of the Turnover Tax Act 1968) and data where this is not the case (seven years, pursuant to Section 52 paragraph 4 of the State Taxes Act). If only one single series of invoices is used (that is, invoices that should be retained for nine and seven years), then a general retention period of nine years must be applied. This selection list therefore has a period of ten years, the sum of nine years and one reserve year.

However, it is permitted to work with multiple series, with a possible distinction being made between general financial documents and financial property documents. In that case, a retention period of seven years may be applied to the first series and one of nine years to the second. If deduction of input tax is claimed for immovable property, in accordance with the Turnover Tax Act 1968, a retention period of ten years should be applied, due to the existing review period for this deduction of input tax. This latter provision arises from Section 5.1 of the Turnover Tax Deduction (Exclusion) Decree (published in the Government Gazette on 6 December 2011, no. 21834).

1.6.4 Destruction exemptions

In certain cases, universities and UMCs may exempt information objects from destruction that are otherwise destructible according to the selection list, in accordance with Section 5 paragraph 1 under e of the Public Records Degree 1995.

Hotspot monitor

Firstly, this can be on the basis of a hotspot monitor.

A hotspot is an event or issue that results in notable or intensive interaction between the organisation and society and/or students. It is therefore about matters that cause a great deal of social upheaval. Hotspots meet one or more of the following criteria:

- A shocking occurrence or series of occurrences that create much social upheaval and of which there is extensive media coverage. For example, the shooting incident in a shopping centre in Alphen aan den Rijn (2011), the fireworks disaster in Enschede (2000), the crash of flight MH17 (2014); fraud by a researcher at a university or UMC (2011).
- An occurrence or issue that highlights significant divisions between citizens, patients, or students, where the debate about the issue unleashes a great many emotions. The occupation of the Maagdenhuis Building (2015) is a case in point.
- An occurrence or issue that leads to an intensive public debate on the functioning of the organisation. For example, the sharing of telephone communications metadata by the General Intelligence and Security Service (AIVD) with the NSA (2014); the Schiphol fire (2005).
- A political issue that seriously threatens the position of the management of the organisation. The eviction of the Maagdenhuis Building (2015), for example.

The hotspot monitor is carried out on a periodic basis with the aim of ensuring that the information objects that relate to these hotspots are given a permanent retention designation.

The results of the hotspot monitors are not recorded time after time in a reviewed selection list, but in a separately published hotspot list.

The selection list simply describes and sets out what procedure is being followed and what criteria are being applied for the purpose of making exceptions. What is recorded, therefore, is how the hotspot monitors are periodically¹³ carried out. This makes it possible to see how selection decisions are made.

It is impossible and indeed undesirable to set up the same hotspot monitor for all universities and UMCs. Every organisation is unique, after all. This is why universities and UMCs are advised to use the guide entitled '*Belangen in Balans*' (*version 1.0*) by the National Archives as a basis for setting up their own tailor-made procedure for their own organisation and to add it to the explanatory notes of the hotspot list. However, it has been agreed that each university and each UMC will examine, every one to three years, whether there are potential hotspots before obtaining written advice from an official at the National Archives, and, finally, agreeing on hotspots in a written Strategic Information Consultation. The hotspot list is published by the National Archives on its website. Additionally, universities and UMCs can use a joint platform – such as the ASW working group of the UPIR – to enter into discussions with the National Archives, to share knowledge, and to identify any hotspots that the organisations have in common.

Special information objects

An organisation may also elect to exempt information objects from destruction in the following cases.

- cases or their circumstances whose character is unique to the university or UMC;
- cases that describe unique occurrences that should be retained for historical purposes;
- information objects that are representative of circumstances that are special in terms of the time when they existed;
- information objects from a person who fulfilled a notable role in society, or who continues to do so, and who was a student or employee at the university or UMC in question;

¹³ There is a guide for local authorities that can serve as a source of inspiration (<https://vnq.nl/onderwerpenindex/dienstverlening-en-informatiebeleid/archieven/publicaties/handreiking-periodieke-hotspot-monitor-decentrale-overheden>) and there is also information available on the National Archives website <https://www.nationaalarchief.nl/archiveren/kennisbank/hotspotlijst-maken#collapse-5152> (both in Dutch only)

- information objects that give a good picture of the organisation or its mission. This can be done by permanently retaining examples or a more extensive representative selection. This means an idea is kept of the relevant information objects, such as course material or theses;
- information objects that have set a precedent;
- information objects that can replace other documentation that has been lost;
- information objects that are necessary for the context of other documentation being retained.

This could also involve events that did not go ahead, but which should be preserved because of their notability.

A precondition for exceptions is that the reasons should be stated with the relevant documents, and that account should be taken of applicable privacy legislation.

1.6.5 Evaluation

Organisations carry out evaluations in a range of areas. The retention period for investigations of this kind depends on the process that is being evaluated. In other words, if a process has to be retained, so does the evaluation of the process. There are also final evaluations and interim evaluations. Interim evaluations and annual evaluations may be destroyed after five years.

II. The processes

2.1 Management and structure of the organisation

The management processes mostly concern the tasks relating to the setting up, maintaining, and eventual dissolution of the university or UMC as a whole. The sequence of the processes is as follows: institution, general policy, collaboration and participation, monitoring, strategic consultations, and dissolution.

Number	1
Core description	Organisational management
Process	Setting up a board and appointments thereto
Actor	Supervisory Board
Basis	WHW Sections 9.3 and 12.4
Information objects	Decision
Valuation	Retention (SA-B4)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Number	2
Core description	Appointments of board members
Process	Appointing a board member
Actor	Supervisory Board
Basis	WHW Sections 9.3 and 12.4; Works Councils Act, Section 30; Participation (Clients of Care Institutions) Act, Section 3
Information objects	Appointments; Rules concerning nominations and appointment; Nomination; Recommendation
Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Vice-chair, Student as assessor V five years after end of appointment • Recommendations and Nominations V five years after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>This also includes the appointments of deans, rector magnificus, and secretary to the supervisory board. It also includes the appointments of directors of a research school if it concerns an independent body. If the research school comes under the responsibility of a dean, the appointment comes under 118.</p> <p>For UMCs, this covers the appointments of the members and the chair of the board of directors.</p>
Number	3
Core description	Establishment of and changes to organisation
Process	The establishment of or changes to or dissolution of an organisation or division thereof
Actor	Institutional management
Basis	Internal or WTZi; WEB Section 2.1.10
Information objects	Organisational structure; Establishment or amendment decision; Rules on the structure of the restructuring code; Structure regulations; Registration in CROHO register; Recommendations by representative advisory bodies; WTZi admission decision
Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Entry into register V two years after expiry • Not taken place V five years after completion
Type of valuation	Indicative

Comments	Mergers with other organisations come under this process. For setting the responsibilities of parties with responsibilities (board members) in the organisational units, see process 2 . For the establishment of a foundation or enterprise whose purpose is the valorisation of research, see process 74 .
Number	4
Core description	Drawing up Statutes
Process	Drawing up or amending statutes
Actor	Institutional management
Basis	Internal
Information objects	Statutes; Consent decision by representative advisory council
Valuation	Retention (SA-B4)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	This also includes the drawing up of a students' charter.
Number	5
Core description	Management and administration regulations
Process	Drawing up management and administration regulations
Actor	Institutional management
Basis	WHW Section 9.4: WHW Section 12.7
Information objects	Management and administration regulations
Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Recommendations; Notifications to minister V five years after completion • Not taken place V one year after completion
Type of valuation	Indicative
Number	6
Core description	Strategic plans
Process	Drawing up a strategic plan
Actor	Institutional management
Basis	WHW Section 2.2
Information objects	Strategic plan; Consent decision by representative advisory council
Valuation	Retention (SA-B3)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	Pursuant to the WHW, such a plan is agreed once every six years.
Number	7
Core description	Long-term policy plans
Process	Drawing up business plans or long-term policy plans for the institutional management/faculties/divisions
Actor	Management of organisational unit
Basis	Internal
Information objects	Business plan; Long-term policy plan; Vision document; Strategy plan
Valuation	Retention (SA-B3)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Number	8

Core description	Ethical guidelines
Process	Drawing up guidelines related to the ethical/medical ethical aspects of the work of the institution
Actor	Institutional management
Basis	WHW Section 1.7 or Internal
Information objects	Guidelines; Decision; Recommendations by ethics committee; Recommendations by representative advisory body
Valuation	Retention (SA-B3)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	9
Core description	Collaboration between government-funded institutions for higher education and healthcare (Joint regulations)
Process	Entering into collaborative partnerships by government-funded institutions
Actor	Institutional management
Basis	WHW Section 8.1; WEB Section 1.4.a.1 or Internal
Information objects	Deed of foundation; Statutes; Extract from Chamber of Commerce; Collaboration agreement; Joint regulations; Policy on implementation of collaboration agreement
Valuation	Retention (SA-B4)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	This process also applies to collaborations with partners abroad and between UMCs and affiliated hospitals. For two organisations to jointly provide degree programmes or specialisations, see process 43 .
Number	10
Core description	Participation in decision-making systems
Process	Selecting participation in decision-making systems
Actor	Institutional management
Basis	WHW Section 9.30
Information objects	Decision; Consent decision by representative advisory council
Valuation	Retention (SA-B4)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	The Institutional management decides whether the Works Councils Act (except Chapter VII B) applies to the university or UMC. Such decisions may be reviewed, but no more than once every five years.
Number	11
Core description	Regulations for participation in decision-making
Process	Drafting regulations for participation in decision-making
Actor	Institutional management; Board of the organisational unit; Representative advisory body
Basis	WHW Sections 9.34-9.35, 9.38b; WMCZ Section 2.2; WOR Section 8
Information objects	Regulations for participation in decision-making
Valuation	Retention (SA-B4)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	12
Core description	Institution representative advisory body

Process	Setting up a representative advisory body
Actor	Institutional management; Board of the organisational unit
Basis	WHW Sections 9.31, 9.37; WMZC Section 2; WOR Sections 3 and 4
Information objects	Institution decision; List of members; Establishment report; Evaluation
Valuation	Retention (SA-B4)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	As well as the works council or representative advisory council, the establishment of university councils, the UMC council, sub-councils, employee consultative bodies, institution councils, client/patient councils, employee covenants, student councils, and faculty councils also fall under this process.

Number	13
Core description	Representative advisory body elections
Process	Organising elections for a representative advisory body
Actor	Institutional management; Board of the organisational unit
Basis	WHW Section 9.31; WOR Section 6
Information objects	Electoral register; Voting data; Ballot papers; Election results; Announcement of results; Election regulations; Composition of central voting office; Appointment
Valuation	V one year after confirmation of results
Other valuation	<ul style="list-style-type: none"> • Regulations ten years after period of operation • Appointment V five years after end of period of office • Election results Retention (SA-B4) • Ballot papers V six weeks after confirmation of results • Not taken place V one year after completion
Type of valuation	Indicative
Comments	The relevant section of the act makes no mention of how often the elections should take place. The retention period concerns the period in which the information objects may be used in evidence for accounting for the process. This process also applies to university councils, student councils, employee consultative bodies, sub-councils, client councils, and faculty councils.

Number	14
Core description	Disputes between representative advisory body and management
Process	Dealing with disputes between a representative advisory body and the management
Actor	Institutional management; Board of the organisational unit
Basis	WHW Sections 9.39 and 9.40 paragraph 2; WMCZ Sections 10.2-10.3; WOR Section 36
Information objects	Description of dispute; decision
Valuation	Retention (SA-B1) (if it affects policy)
Other valuation	<ul style="list-style-type: none"> • If it has no effect on policy V ten years after completion • Not dealt with V one year after completion
Type of valuation	Indicative
Comments	Not every dispute between a representative advisory council is regarded as being of interest. For that reason, the only disputes retained are those that have led to modifications to the policies of the organisation.

Number	15
Core description	Representative advisory body annual reports

Process	Drawing up an annual report about the activities of the representative advisory body
Actor	Representative advisory body
Basis	WHW Section 9.32; WMCZ Section 9; WOR Section 14; WEB Section 1.3.6 paragraph 2
Information objects	Annual report
Valuation	Retention (SA-B4)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	16
Core description	Annual reports
Process	Adoption of annual statement of accounts and annual report
Actor	Institutional management; Board of the organisational unit
Basis	WHW Sections 1.12, 2.9, 2.14, 2.19, 9.8; WMCZ Section 9; WTZi Section 15
Information objects	Annual statement of accounts; (financial) Annual report; Adoption decision; Annual document; Auditor's remit; Auditor's report; Cover letter to minister
Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Engagement letter for auditor V seven years after completion • Cover letter to minister; Auditor's report V twenty years after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>The institutional management submits the report to the minister by 1 July every year. With a view to compliance, the valuation of auditors' reports is set at twenty years. These reports usually form part of the annual statement of accounts and are therefore kept permanently.</p> <p>This process also applies to the annual reports by committees and organisational units. Financial accountability of the organisational units comes under process 134.</p>
Number	17
Core description	Strategic consultations
Process	Holding periodic consultations at strategic level
Actor	Institutional management
Basis	Internal
Information objects	Agenda incl. appendix; Minutes/Report; List of decisions
Valuation	Retention (SA-B1)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>This includes meetings of the institutional management, the faculty boards, meetings between the institutional management and the minister, and meetings between the management of a university and a teaching hospital. The meetings between the management and a representative advisory body also come under this process, as do those of consultation platforms if the institution performs the secretarial tasks. Consultations on policy regarding the carrying out of medical procedures and care and medical experiments are similarly covered.</p> <p>If the institution also archives the meetings of the supervisory board, this falls under this process too. In this context, the programme committees are regarded as representative advisory bodies and they are covered by the same process as well.</p>

For information about the retention periods, see [Section 3.6.2](#)

Number	18
Core description	Tactical consultations
Process	Holding periodic consultations at tactical level
Actor	Institutional management
Basis	Internal
Information objects	Agenda; Minutes/Report; List of decisions
Valuation	V ten years after completion
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>This process covers meetings between the institutional management and the management units (departments), the meetings of the teaching committee and the examinations board. It also extends to meetings within a management unit, management consultations with third parties, meetings of committees and working groups where the institution carries out the secretarial tasks.</p> <p>Policy decisions follow from those taken by the institutional management, as a result of which the valuation for this process does not have to be permanent. Management consultations related to one subject and which in that context form part of a specific process carried out by an institution come under this process and are therefore given the retention period of said process.</p>
Number	19
Core description	Operational consultations
Process	Holding consultations at operational level
Actor	Institutional management
Basis	Internal
Information objects	Agenda; Invitation; Report; List of decisions
Valuation	V five years after completion
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>This includes meetings with third parties (person or institution) to the extent that they do not concern management consultations. Work consultations are also covered by this. If an institution carries out the secretarial tasks for a consultation platform in which multiple organisations are represented, this comes under process 17.</p> <p>For information about the retention periods, see Section 3.6.2</p>
Number	20
Core description	Participation on consultation platform
Process	Deciding to take part on a consultation platform
Actor	Institutional management
Basis	Internal
Information objects	Decision; Deed; Statutes
Valuation	Retention (SA-B2)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>A consultation platform is a meeting between different institutions. This can take place at different levels. The meeting itself comes under process 17 or process 19, depending on who carries out the secretarial tasks.</p>

Number	21
Core description	Dissolution of institution
Process	The dissolution of an education institution or teaching hospital
Actor	Institutional management
Basis	WHW Section 2.16 or Internal
Information objects	Final settlement; Auditor's report; Cover letter to minister; Notarial deed; Dissolution decision, including reason for dissolution
Valuation	Retention (SA-B4)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	The final settlement is sent to the minister. For the setting up of an institution, see process 3 .

Number	22
Core description	Relocating students in the event of dissolution
Process	Taking measures and announcing measures taken by the institution regarding the relocation of students in the event of termination or dissolution of the institution
Actor	Institutional management
Basis	WHW Section 2.16
Information objects	Decision; Announcement
Valuation	V ten years after announcement
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative

Number	23
Core description	Quality assurance system
Process	Development and application of a quality assurance system
Actor	Institutional management
Basis	WHW Section 1.18; Internal policy; WEB Section 1.3.6
Information objects	Quality policy memorandum; Consent decision by representative advisory council
Valuation	V seven years after modification
Other valuation	<ul style="list-style-type: none"> • Quality policy memorandum: Retention (SA-B4) • Audits V ten years after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>The process concerns only the formalised quality assurance system itself. Quality assurance is assessed according to the following quality aspects:</p> <ul style="list-style-type: none"> • a. the institution's vision for the quality of its teaching; • b. the design and the effectiveness of the internal quality assurance of an institution; • c. the policy carried out in the area of staff and facilities; and • d. the facilities that improve access and study programme feasibility for students with functional impairments. <p>Changes to the quality assurance system can be important regarding the accreditations of degree programmes. In the light of this aspect, the valuation for this process is seven years. The quality assurance system itself, in principle, does not need to be considered for permanent retention. For building up a history of the evolution of quality, it is recommended that the Quality Policy Memorandum be retained.</p>

Number	24
Core description	Institutional quality assurance audits
Process	Requesting an institutional quality assurance audit (ITK)
Actor	Institutional management
Basis	WHW Sections 5.23 to 5.30; Specific regulations on healthcare
Information objects	Request; Decision on institutional audit; ITK report; ITK recognition
Valuation	V seven years after entering into force
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	This process is described in the Accreditation Organisation of the Netherlands and Flanders (NVAO) selection list as 'Institutional quality assurance audits' (process 01), with a valuation of eighteen years for the most important information objects. Institutions may decide for themselves to keep the institutional audits for longer periods of time. This process also concerns quality controls that departments in teaching hospitals undergo.
Number	25
Core description	Investigations by inspectorates
Process	Facilitating investigations by inspectorates
Actor	Institutional management
Basis	Education Inspection Act, Section 12a; Health Care (Market Regulation) Act; Medicines Act; Healthcare Quality, Complaints and Disputes Act;
Information objects	Announcement of audit; Audit report; Response to audit report; investigation report; Information for inspectorate
Valuation	V five years after completion
Other valuation	<ul style="list-style-type: none"> • Information for inspectorate V two years after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	The audits by the Inspectorate of Education are carried out once every four years and retained by the Inspectorate itself for at least ten years. The audits are designated as 'Supervision of Higher Education' in the Inspectorate's selection list. This process also covers investigations by the Inspectorate in response to complaints. UMCs are similarly subject to the Inspectorate for Health and Youth Care, the Dutch Healthcare Authority, and the Netherlands Authority for Consumers and Markets. For evaluations by the Commission for the Registration of Nursing Specialisms (RGS) see process 37 .
Number	26
Core description	Satisfaction surveys
Process	Carrying out satisfaction surveys
Actor	Management of organisational unit
Basis	WHW Section 1.18 paragraphs 1 and 3; Internal policy
Information objects	Proposal; Structure; Survey results; Survey report
Valuation	V ten years after completion
Other valuation	<ul style="list-style-type: none"> • Survey results V one year after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	This refers to surveys carried out by or on behalf of institutions among students, patients, clients, or employees. Survey results are defined as the

individually completed questionnaires. Special satisfaction surveys may be retained permanently, under Section [1.6.3](#)

2.2 Teaching - development and implementation of policy

This section first describes the processes for developing policy relating to teaching, followed by the development and implementation of degree programmes, course units, and tests.

2.2.1 Development of education policy

This section contains the policy-related processes for teaching, such as the arrangements that need to be made and procedures that need to be drawn up. The sequence used here is policy regarding assessment and support for students, the establishment of and regulations for committees and quality assurance. This list is limited to policy-making processes that are specifically referred to in legislation or are otherwise of considerable interest.

Number	27
Core description	Regulations on binding study advice
Process	Drawing up the Regulations on binding study advice
Actor	Institutional management
Basis	WHW Section 7.8b
Information objects	Regulations on binding study advice; Substantive criteria for binding study advice; Consent decision by representative advisory council
Valuation	Retention (SA-B3)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	This process can also be part of process 44 . Process 56 deals with the issuing of binding study advice.
Number	28
Core description	APL procedures
Process	Drawing up procedures and criteria for the accreditation of prior learning (APL)
Actor	Institutional management
Basis	WHW Section 7.16
Information objects	APL procedure
Valuation	Retention (SA-B3)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	29
Core description	Profiling funds
Process	Setting up a profiling fund and adopting the procedures
Actor	Institutional management
Basis	WHW Sections 7.51, 7.51a, 7.51b, 7.51c, 7.51d, 7.51e, 7.51f, 7.51g, 7.51h
Information objects	Profiling fund regulations; Recommendations
Valuation	Retention (SA-B3)
Other valuation	<ul style="list-style-type: none"> Internal recommendations V five years after completion Not taken place V one year after completion
Type of valuation	Indicative
Comments	The awarding of provisions from the profiling fund is part of a separate

student administration process ([process 96](#)).

Third-party recommendations must be retained. Recommendations by committees/internal committees may be destroyed after five years.

Number	30
Core description	Setting fees
Process	Setting institutional tuition fees, examination fees for external students and other payments
Actor	Institutional management
Basis	WHW Sections 7.45 to 7.50
Information objects	Tuition fee regulations; Recommendations by representative advisory council
Valuation	Retention (SA-B3)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	31
Core description	Setting up an Examinations Appeals Board
Process	Setting up an Examinations Appeals Board (CBE)
Actor	Institutional management
Basis	WHW Sections 7.60 and 7.62
Information objects	Regulations; Rules of Procedure; Recommendation by representative advisory council; Appointment
Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Appointment V seven years after end of appointment • Not taken place V one year after completion
Type of valuation	Indicative
Comments	For dealing with appeals, see process 64 . The CBE used to be abbreviated as COBEX.
Number	32
Core description	Setting up an arbitration committee
Process	Setting up an arbitration committee
Actor	Institutional management
Basis	General Administrative Law Act 7.13; WHW Section 7.63a
Information objects	Regulations; Rules of Procedure; Recommendation by representative advisory council; Appointment
Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Appointment V seven years after end of appointment • Not taken place V one year after completion
Type of valuation	Indicative
Comments	This process is specifically intended for the arbitration committee referred to in Section 7.63 of the WHW. For dealing with appeals, see process 123 .
Number	33
Core description	Developing an education policy
Process	Developing and setting an education policy
Actor	Institutional management
Basis	Internal
Information objects	Policy document; Adoption decision; Evaluation; Recommendation by representative advisory council
Valuation	Retention (SA-B3)
Other valuation	<ul style="list-style-type: none"> • Implementation regulations (adopted annually) V five years after completion • Not taken place V five years after completion

Type of valuation	Indicative
Comments	This concerns the development of policy not specifically set out in legislation, but which nonetheless plays a key role in how the work is carried out. Regulations for joint student services are also part of this. This includes student health services, student psychologists, student counsellors, student sports facilities, etc.

2.2.2 Teaching – development of teaching

This part contains processes that are carried out in the development, continuation, and discontinuation of degree programmes. In this context, quality assurance comes under the continuation of teaching. The sequence used is the development and discontinuation of degree programmes, followed by accreditation and quality assurance.

Number	34
Core description	Educational profiles
Process	Drawing up educational profiles
Actor	Institutional management
Basis	Internal
Information objects	Educational profile
Valuation	Retention (SA-B3)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Number	35
Core description	Developing a degree programme
Process	Developing a new degree programme
Actor	Institutional management
Basis	WHW Sections 6.2, 7.8a; CAO UMC
Information objects	Macro-efficiency check report; Recommendation Programme committee; Consent and recommendation decision; Information concerning content and objective of degree programme; Application; CROHO registration; Teaching assignment to third party; Programme schedule for AIO(S); Evaluations; Designation of degree programme with binding study advice
Valuation	Retention (SA-B3)
Other valuation	<ul style="list-style-type: none"> • CROHO registration V two years after termination • Programme schedule for AIO(S) V five years after completion • Not taken place V five years after completion
Type of valuation	Indicative
Comments	This concerns both Bachelor's and Master's programmes, and tracks for associate degrees. After a macro-efficiency check (MDT) by the Higher Education Efficiency Committee (CDHO) has been accepted by the Ministry of Education, Culture and Science, the Institutional management presents these decisions to the CROHO to be registered there. The new degree programme assessment (TNO) by the NVAO is covered by process 41 .
Number	36
Core description	Accreditation of degree programmes
Process	Applying to the NVAO for accreditation of a degree programme
Actor	Institutional management
Basis	WHW Sections 5.8 to 5.18
Information objects	Application; Accreditation file; Management review; Assessment report; Accreditation report; NVAO decision; Recognition by KNMG

Valuation	V seven years after entering into force
Other valuation	<ul style="list-style-type: none"> • Accreditation report: Retention (SA-B3) • Refusal V five years after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	The retention period is based on the expiry period of six years after the entry into force of the accreditation decision, pursuant to Section 5.8 of the WHW. In this process, only the critical reflection is of historic value. The other information objects lose their value after the expiry of the accreditation decision. This process is described in the NVAO selection list as 'Accreditation of degree programmes' (process 03), with a retention period of eighteen years for the most important information objects. The Commission for the Registration of Nursing Specialisms forms part of the Royal Dutch Medical Association (KNMG).
Number	37
Core description	Recognition of medical specialist degree programmes
Process	Requesting recognition as trainer, deputy trainer, and training institution at the Commission for the Registration of Nursing Specialisms (RGS)
Actor	Institutional management
Basis	Framework Decision CCMS 2020
Information objects	Request; Recognition decision; Assessment report; Evaluation report
Valuation	V five years after expiry
Other valuation	<ul style="list-style-type: none"> • Assessment report; Evaluation six years after completion • Not taken place V one year after completion
Type of valuation	Minimal
Comments	The programme or trainer is granted recognition that continues until it is revoked. The organisation is evaluated by the RGS every five years.
Number	38
Core description	Revocation of degree programme accreditations
Process	Processing a proposed revocation of a degree programme accreditation
Actor	Institutional management
Basis	WHW Sections 5.19 to 5.21
Information objects	Notice of revocation; Report of meeting; Revocation decision; Announcement
Valuation	V four years after completion
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	The retention period is based on the fact that, pursuant to Section 5.9 paragraph 1a of the WHW, an institution may not apply to the accreditation body for any new degree programmes of an identical or similar nature for a period of three years after revocation or refusal of the accreditation. Controversial matters may be retained permanently as exceptions to the selection list (see Section 1.6.4).
Number	39
Core description	Discontinuation of degree programmes
Process	Discontinuing a degree programme
Actor	Institutional management
Basis	WHW Section 6.15
Information objects	Discontinuation decision; Notification to minister
Valuation	Retention (SA-B3)

Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	This could also include the discontinuation of a track.
Number	40
Core description	Application for a macro-efficiency check
Process	Applying for a macro-efficiency check by the Higher Education Efficiency Committee (CDHO)
Actor	Institutional management
Basis	WHW Section 6.2; Policy rule on the macro-efficiency of higher education
Information objects	Application; Decision; Labour market research; Intake survey; Impact assessment
Valuation	V seven years after completion
Other valuation	Not awarded V five years after completion
Type of valuation	Indicative
Comments	The final report of the macro-efficiency check is part of process 35 and is retained in this file permanently.
Number	41
Core description	Application for a new degree programme assessment
Process	Applying to the NVAO for a new degree programme assessment (' <i>toets nieuwe opleiding</i> ', TNO)
Actor	Institutional management
Basis	WHW Section 5.6
Information objects	Application; Information file; Panel recommendation; NVAO decision; Submission to DUO; Confirmation by DUO
Valuation	V seven years after entering into force
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	The information objects lose their value after the expiry of the accreditation decision. This process is described in the NVAO selection list as 'Assessment of new degree programme' (process 04), with a retention period of eighteen years for the most important information objects. This process may coincide with process 35 .
Number	42
Core description	New location of degree programme
Process	Deciding to base a degree programme or part thereof in one or more other municipalities
Actor	Institutional management
Basis	WHW Sections 7.17, 7.17a; Policy rule on the macro-efficiency of higher education
Information objects	Decision; Request for minister's approval; Approval by minister
Valuation	Retention (SA-B3)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	The Institutional management may decide that a degree programme or part thereof should be based in one or more other municipalities. The Institutional management puts this proposal to the Minister of Education, Culture and Science for approval. For the macro-efficiency check, see process 40
Number	43
Core description	Collaboration between degree programmes

Process	Two organisations jointly providing a degree programme or specialisation
Actor	Institutional management
Basis	WHW Sections 7.3c, 7.3d, 7.3e, 7.3g; WEB Section 1.4.a.1
Information objects	Agreement
Valuation	Retention (SA-B3)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	See also Section 3.6.9 . For the setting up of collaborative partnerships by government-funded institutions, see process 9 .
Number	44
Core description	Teaching and Examination Regulations
Process	Drawing up or updating teaching and examination regulations (OER)
Actor	Institutional management
Basis	WHW Sections 7.7, 7.8, 7.8a, 7.13, 7.25, 7.27, 7.28, 7.29, 7.30, 7.30b, 7.57i, 7.59, 10.3b, 10.3c, 10.16b, 10.20; WEB 7.4.8
Information objects	Teaching and examination regulations (OER); Recommendation from Programme committee; Regulations on binding study advice (incl. content criteria); Consent decision by representative advisory council; Graduation handbook; Recommendation from examinations board; Evaluation
Valuation	Retention (SA-B3)
Other valuation	<ul style="list-style-type: none"> • Recommendation from Programme committee; Consent from representative advisory council; Recommendation from examinations board V five years after period of operation • Not taken place: V one year after completion
Type of valuation	Absolute
Comments	The regulations on binding study advice (see process 27) and the OER are regarded as one document. The students' charter often forms part of this as well. However, it may also feature separately, in which case it comes under process 4 . A graduation handbook may often form part of the OER. If there is a generic OER, the faculty OERs may be destroyed five years after their period of operation.
Number	45
Core description	Additional admission requirements for degree programmes
Process	Drawing up additional admission conditions and requirements for Bachelor's and Master's programmes
Actor	Institutional management
Basis	WHW Sections 7.26, 7.26a
Information objects	Selection criteria and procedure; Direction by minister
Valuation	Retention (SA-B3)
Other valuation	Not taken place V one year after completion
Type of valuation	Absolute
Comments	According to the WHW, any such decision must be taken by the minister. The university or UMC initiates this, and it is in their interest to retain the copy of the decision.
Number	46
Core description	Additions to degrees
Process	Setting an addition to a degree
Actor	Institutional management
Basis	WHW Section 7.10a
Information	Decision

objects	
Valuation	Retention (SA-B3)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	47
Core description	Special study tracks
Process	Establishing study routes and special study tracks
Actor	Institutional management
Basis	WHW Section 7.9b
Information objects	Study route/study track; Decision
Valuation	Retention (SA-B3)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	This concerns the establishment of the track itself, not the selection of students and the subsequent taking of the track.

2.2.3 Teaching - implementing teaching

This part concerns the processes in which the actual teaching is planned, timetabled, and provided. The sequence used is the entrance tests for students, the propaedeutic phase, the main phase, and appeals. There is a separate component for the testing and assessing of students, [Section 2.2.4](#).

Number	48
Core description	Course units
Process	Organising and providing course units (courses)
Actor	Management of organisational unit
Basis	WHW Section 7.3
Information objects	Evaluation; Outline description of content of programme components, including learning outcomes, learning objectives, teaching methods, assessment method, prescribed and recommended literature, lecturer, and credits; manuals and other study materials
Valuation	V seven years after adoption
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	Files of course units may be important for accreditation purposes. For this reason, the valuation applied is at least seven years, in keeping with the retention period for information objects arising from the preparation and evaluation of examinations. NVAO descriptions serve as the starting point for the information objects. Because of their historic importance, an institution may decide to keep a representative selection (see Section 1.6.4).
Number	49
Core description	Internships
Process	Entering into and supervising an internship or graduation process
Actor	Management of organisational unit
Basis	Internal or WHW Section 7.10, 7.3
Information objects	Internship work plan; Internship agreement; Graduation agreement; Progress report; Research report; Internship report; Accounting for time; Assessment
Valuation	<ul style="list-style-type: none"> • If graduation track V seven years after completion • Internship agreement V seven years after completion

	<ul style="list-style-type: none"> • If internship as stand-alone course/examination V two months after completion, with exception of internship agreement
Other valuation	<ul style="list-style-type: none"> • Accounting for time V one year after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	A distinction should be made between internships as stand-alone modules and those that form part of a final project based on Section 7.10 and 7.3 of the WHW. This process also covers internships that students at the institution must take as a course, examination, or part of their overall academic review. For internships carried out at the institution itself, see process 111 and Section 3.6.6 of the explanatory notes.
Number	50
Core description	Teaching agreements
Process	Drawing up and entering into teaching agreements for degree programmes/work-study degree programmes for individual students
Actor	Management of organisational unit
Basis	WHW Section 7.7
Information objects	Agreement
Valuation	V seven years after termination
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	The period is set at seven years after completion because of the possible financial and other rights that may be derived from the agreement.
Number	51
Core description	Provision of information to students
Process	Publishing and issuing information for students or prospective students
Actor	Management of organisational unit
Basis	WHW Section 7.15
Information objects	Information brochure; Internet publication; Course catalogue
Valuation	V seven years after publication
Other valuation	Course catalogue Retention (SA-B3)
Type of valuation	Indicative
Comments	This process concerns the provision of sufficient information to students and prospective students about the institution, the courses and programmes available, and the names of the degree programmes. The information objects prove that the institution has enabled its students to compare their study options and to reach a sound judgement about the content and structure of the courses/programmes and the examinations. The period is set at seven years because of the possible rights that may be derived from the information provided. Based on Section 1.6.3 , certain information may be considered for permanent retention. Not every institution has a course catalogue. In some cases, the course catalogue is shown on various pages of the relevant website. These institutions can therefore not retain the course catalogue as an information object. These institutions retain their 'course catalogues' as part of their websites. For the retention of websites, see the explanatory notes to process 148 .

2.2.4 Teaching – Assessment

This part contains the processes for accounting for the assessment of students. The sequence used is the admission tests for students, the examinations and essays, the review of students' academic records, and appeals.

Number	52
Core description	Exemptions
Process	Granting candidates exemptions from examination components
Actor	Examinations Board
Basis	WHW Sections 7.12b, 7.30
Information objects	Request for exemption; Prior education degree certificate; Prior education diploma supplement; Proof of prior learning (APL); Certificate of prior learning (APL); Exemption with substantiation
Valuation	V two years after termination of enrolment
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	Investigations into exemptions also include those based on prior learning (APL). This investigation may be carried out by an APL committee.
Number	53
Core description	Requests for deviations from teaching and examination regulations
Process	Decisions on request for deviations from teaching and examination regulations
Actor	Examinations Board
Basis	WHW Sections 7.13, 7.30
Information objects	Request for deviation from OER; Decision
Valuation	V two years after termination of enrolment
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	Each degree programme has in its OER a section setting out the standard degree programme, and includes the level to which the components of the study programme must be attained in order for the programme to be completed successfully. The regulations in the OER are binding. However, students may submit a request to the examinations board to deviate from them.
Number	54
Core description	Examinations
Process	Conducting examinations
Actor	Management of organisational unit
Basis	WHW Section 7.10
Information objects	Students' work; Examination protocol; Examination answers; Cut-off score; Attendance list; Test/assignment; Assessment; Second assessment; Evaluation of examination
Valuation	<ul style="list-style-type: none"> • Students' work, first and second assessments, attendance list V two months after completion; • As part of the representative selection V two years after completion • Examination protocol, Examination answers, Cut-off score, Test/assignment, Evaluation V seven years after completion
Type of valuation	Indicative
Comments	This process concerns both written and non-written examinations. The period of two months is based on an appeal period of six weeks, with some allowance for delay. Based on the requirements and comments of the

Visitation and Assessment Body (VBI) and the NVAO, it is possible that the retention period of two years for the representative selection (which applies to the accreditation) will have to be modified by the relevant institution. The period of seven years is based on the accreditation of a degree programme.

See [Sections 3.4.1](#) and [3.4.2](#) in the explanatory notes and justification on the selection list for substantiation of the retention periods and compiling of files.

Number	55
Core description	Fraud
Process	Detecting fraud committed by a student and taking measures in response
Actor	Examinations Board
Basis	WHW Section 7.12b
Information objects	Detection of fraud; Notifying student; Statement of defence by student; Decision on sanction
Valuation	V two years after termination of enrolment
Type of valuation	Absolute
Comments	In the event of serious fraud, the institutional management may, in extreme cases, decide to expel the student from the degree programme. For this process, the Student refusal or removal process (99) is used. Plagiarism is regarded as a form of fraud.
Number	56
Core description	Study advice
Process	Issuing advice to students on whether or not they should continue with their current degree programmes (binding study advice, BSA) or referrals to other degree programmes.
Actor	Management of organisational unit; Examinations board
Basis	WHW Sections 7.8b, 7.9
Information objects	Warning of study advice; Proposed decision; Study advice by student advisor; Binding study advice
Valuation	V five years after issuing
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	57
Core description	Student supervision
Process	Supervising a student during their degree programme
Actor	Institutional management
Basis	Internal policy
Information objects	Careers advice; Psychological supervision; Interview report
Valuation	V two years after termination of enrolment
Other valuation	Not taken place V one year after completion
Type of valuation	Absolute
Number	58
Core description	Propaedeutic phase certificates
Process	Issuing certificates for the propaedeutic phase
Actor	Examinations Board
Basis	WHW Section 7.8
Information objects	Propaedeutic phase certificate
Valuation	V fifty years after completion

Other valuation	Not taken place V two years after termination of enrolment
Type of valuation	Indicative
Comments	Issuing a propaedeutic phase certificate is not a public authority function; this is only the case with the awarding of a degree. However, the certificate does confer a life-long right to invoke the examinations passed in the propaedeutic phase. The beneficiary must therefore be able to receive certified copies from the institution in order to be able to enrol for any follow-up programmes. The certificate for the final phase does not replace the certificate for the propaedeutic phase when it is issued. For this reason, the valuation is set at the same level as that for the examinations for the final phase. See the relevant section for information on the basis for this.
Number	59
Core description	Final projects
Process	Assessing final projects (theses and the like)
Actor	Management of organisational unit
Basis	WHW Sections 7.10, 7.3 paragraph 5
Information objects	Work plan; Final project; Graduation report; Assessment
Valuation	V seven years after completion
Other valuation	Fail V two months after completion
Type of valuation	Indicative
Comments	See Section 3.4.4 for possible longer retention of theses as sources for future research. For the retention of internships as final projects, see process 49 .
Number	60
Core description	Final tests
Process	Conducting a final test by an examinations board
Actor	Examinations Board
Basis	WHW Section 7.10
Information objects	Final test; Student product; Assessment
Valuation	V seven years after assessment
Type of valuation	Indicative
Comments	The final test is an extra test conducted by the examinations board of the student's skills – additional to the 'regular' examinations – if the board suspects that the examinations taken by the student form an insufficient basis on which to reach a final assessment of the student. In keeping with the valuation for final projects, a valuation of seven years after assessment is applied to this process.
Number	61
Core description	Graduation by students
Process	Students graduating
Actor	Examinations Board
Basis	WHW Sections 7.10, 7.11
Information objects	Request; Assessment by Examinations board; Degree certificate; Supplement; Certificates; Register of Diplomas
Valuation	V fifty years after issuing (for more information, see Section 1.6.3 of the introduction and Section 3.4.3)
Other valuation	<ul style="list-style-type: none"> • Request; Assessment by Examinations committee V seven years after issuing • Register of Diplomas Retention (SA-B5)

	<ul style="list-style-type: none"> • Not taken place V two years after termination of enrolment
Type of valuation	Absolute
Comments	This process concerns the submission of the request for a review of the student's academic record and the assessment of same by the examinations board, as well as the decision by the board that the degree may be issued, and the issuing of the degree certificate. Pursuant to the ruling by the Council of State of 19 July 2006 in case 200507749/1, only the statement by the institutional management that a student has obtained a degree may be regarded as a public authority function. For an explanation of the retention periods, see Section 3.4.3 .
Number	62
Core description	Issuing certificates to students
Process	Issuing a certificate or proof of participation to a student
Actor	Institutional management
Basis	Internal policy
Information objects	Certificate; Proof of participation
Valuation	V ten years after issuing
Other valuation	Not taken place V two years after termination of enrolment
Type of valuation	Indicative
Comments	This concerns the issuing of certificates or proof of participation to non-regular students. If a student is able to derive any rights from the certificate, the institution should retain the certificate for as long as the student is able to do so.
Number	63
Core description	Doctorates
Process	Awarding doctorates and granting admission to doctoral programme
Actor	Management of organisational unit
Basis	WHW Section 7.18
Information objects	Assessment; Doctoral/PhD thesis;
Valuation	V ten years after completion
Other valuation	<ul style="list-style-type: none"> • Register of Doctorates Retention (SA-B5) • Failed V two months after completion
Type of valuation	Indicative
Comments	This process covers granting admission to the doctoral programme in special cases. Doctoral degrees do not have supplements and may be directly added to the Register of Doctorates. For this reason, the retention period has been set at ten years. For honorary doctorates, see process 119 .
Number	64
Core description	Appeals to the CBE
Process	Dealing with appeals by the Examination Appeals Board (CBE)
Actor	Management of organisational unit
Basis	WHW Sections 7.61, 7.63
Information objects	Appeal; Confirmation of receipt; Report; Recommendation; Decision
Valuation	Retention (SAB-3) if it affects education policy
Other valuation	<ul style="list-style-type: none"> • Appeal that has no effect on education policy V ten years after completion • Appeal that has not been dealt with: V one year after completion
Type of valuation	Indicative

Comments	The Examinations Appeals Board (CBE, previously COBEX) is, in accordance with Section 7.61 WHW, not authorised to make rulings regarding the issuing of degrees. This comes under process 65 . The indicative valuation for these information objects (especially the reports of the meetings) is based on the possible effect of a ruling on the institution's education policy. For dealing with other disputes, see process 123 .
Number	65
Core description	Appeals to the CBHO
Process	Dealing with appeals to the Higher Education Appeals Board (CBHO)
Actor	Management of organisational unit
Basis	WHW Section 7.66
Information objects	Appeal; Statement of defence; Report; Ruling
Valuation	V five years after completion
Other valuation	Appeal that has not been dealt with V one year after completion
Type of valuation	Absolute
Comments	If an appeal that has been submitted concerns the issuing of a degree, then the ruling in the appeal comes under the public authority functions of the CBHO and therefore the Public Records Act.

2.3 Research

This section deals with the processes for practical, academic, and scientific research at universities and UMCs. The sequence used starts with policy development, and then the implementation and funding of research, before ending with quality assurance and validation.

Number	66
Core description	Research policy development
Process	Developing and setting policy regarding research
Actor	Institutional management
Basis	Internal
Information objects	Policy; decision; Recommendations from relevant and/or legally compulsory advisory committee (see explanation); Medical ethics assessment committee; Animal testing committee; Evaluation; Research protocol for research on humans and animals; Recommendations from representative advisory council
Valuation	Retention (SA-B3)
Other valuation	<ul style="list-style-type: none"> • Non-relevant or non-statutory recommendations V five years after completion • Not taken place V five years after completion
Type of valuation	Indicative
Comments	<p>This concerns the development of policy not specifically set out in legislation, but which nonetheless plays a key role in how the work is carried out.</p> <p>Recommendations by medical ethics assessment committee or the animal testing committee are compulsory for certain research activities and certain policy choices. These must be retained. All other recommendations may be destroyed after five years.</p>
Number	67
Core description	Chairs
Process	Establishing a chair
Actor	Institutional management
Basis	WHW Sections 9.53, 9.58; Research policy plan
Information objects	Proposal for chair; Institution decision; Admission decision; Teaching and research remit; Chair; Termination of chair; Research policy plan; Evaluation
Valuation	Retention (SA-B4)
Other valuation	Not taken place V five years
Type of valuation	Indicative
Comments	<p>A chair is common academic language for a professor's position, occupied by a 'regular' professor or professor by special appointment.</p> <p>The professor occupies a chair with a particular teaching and research remit, the subject or field they are expected to teach and carry out research in. This process applies to 'regular', special, endowed, and rotating chairs. For appointing professors, see process 103.</p>
Number	68
Core description	Collaboration in research
Process	Two or more organisations carrying out joint research
Actor	Institutional management

Basis	Internal
Information objects	Agreement; Evaluation; Additional agreements
Valuation	V ten years after termination
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	See Section 3.6.9 . For the setting up of collaborative partnerships by government-funded institutions, see process 9 . This process applies to national and international cooperation.
Number	69
Core description	Establishment of research school or research institute
Process	Establishing a research school or research institute
Actor	Institutional management
Basis	WHW Section 3
Information objects	Regulations; Joint regulations; Establishment decision; SEP Assessment; Appointment of members; Recommendation; Evaluation
Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Appointment of members V seven years after end of appointment • Not taken place V five years after completion
Type of valuation	Indicative
Comments	This also includes the setting up of a biobank by a UMC. Collaboration with a biobank comes under process 68 . For the setting up of collaborative partnerships by government-funded institutions, see process 9 . For the setting up of an enterprise, see process 74 . If a research school or research institute appoints a director, this comes under process 2 .
Number	70
Core description	Research programmes
Process	Developing a research programme
Actor	Management of organisational unit
Basis	Research policy plan
Information objects	Report of research programme; Evaluation report
Valuation	Retention (SA-B3)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	71
Core description	Procurement of research projects
Process	Procuring research projects
Actor	Management of organisational unit
Basis	Research policy plan
Information objects	Client contact; Confirmation; Agreement; Rejection
Valuation	V seven years after period of operation
Other valuation	<ul style="list-style-type: none"> • Rejection V one year after completion • Medical research proposals register Retention (SA-B3)
Type of valuation	Indicative
Comments	The retention period depends on the success of the procurement attempt, especially if it has financial consequences resulting from the agreement and client contacts. Non-successful research proposals may be retained for as long as they have information that is of value to the university or UMC. Institutions may decide for themselves to keep potentially useful client

contacts for longer periods of time.

For the retention of a register of medical research proposals, see [Appendix 1](#).

Number	72
Core description	Research projects
Process	Setting up and carrying out a research project
Actor	Institutional management
Basis	Research policy plan; Nagoya protocol (Regulation EU 511/2014)
Information objects	Project plan; Final report/research results; Recommendation by relevant and/or statutory committee; Raw research data; Evaluation report; Lab journal; Permission by patients for use of their medical data; Permission to carry out research in hospital; Appointment of supervisor; Project permit
Valuation	V ten years after end of research
Other valuation	<ul style="list-style-type: none"> • Project plan; Final report/research results; Recommendation by relevant or statutory committee Retention (SA-B3) • Raw research data: in accordance with the provisions of the project plan (see Section 3.5.1) • Permission to reuse blood or residual tissue V five years after end of period of operation • Permission to carry out the work in hospital V two years after termination • Issuing animal testing data V five years after completion (retention period starts after the end of the calendar year in which the data was gathered) • Laboratory animals history files V seven years after end of testing or use of laboratory animal • Agreements on the use of genetically modified organisms V twenty years after validity period • Not taken place V five years after completion
Type of valuation	Indicative
Comments	<p>No legal basis for valuations has been found for applied research. The valuation concerns the applied research value of the research results and justification for future research.</p> <p>The decision on whether to permanently retain source material depends on the type of research, the necessity of the source material for substantiating the results, and the usefulness of the source material for any subsequent research.</p> <p>Recommendations that must be retained (if present): Medical ethics assessment committee, Central Medical Scientific Research Committee; Animal testing committee, Central Authority for Scientific Procedures on Animals, and Scientific Council.</p> <p>An explanation for the retention period of raw data is given in Section 3.5.1. It also explains that specific processes in this process (permits, accounting records, etc.) each have their own place on the selection list, and therefore their own retention periods.</p> <p>Section 3.5.2 explains how patients' medical data should be treated in clinical trials (which come under process 80).</p> <p>For agreements relating to the carrying out of research, see process 68. For institutional animal testing permits, see process 117; for animal testing project permits, see process 133.</p>

Number	73
Core description	Research evaluation validation
Process	Evaluating the quality assurance system for research, and having it validated
Actor	Institutional management
Basis	Standard Evaluation Protocol 2015-2021
Information objects	Self-evaluation; Report of findings; Administrative discussion; Administrative response
Valuation	Retention (SA-B4)
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	See Section 1.6.4 for an explanation about evaluations

2.4 Valorisation

Valorisation is a core task of any university or UMC. Knowledge gathered by universities and UMCs should be disseminated. Methods by which an institution can share knowledge include publishing it, entering into partnerships with public and private sector bodies and companies, establishing start-ups, and applying for patents. This section contains a number of processes that are specifically intended for valorisation; other processes related to valorisation are:

- [Process 68](#) 'Collaboration in research' is meant for entering into collaboration agreements for conducting research.
- [Process 119](#) concerns the receipt or issuing of prizes or awards. If a research receives a prize, this is covered by this process.
- [Process 144](#) is about the awarding of subsidies to third parties.
- [Process 149](#) concerns the organisation of events including organising the dissemination of knowledge through symposiums, for example.

Number	74
Core description	Setting up an enterprise
Process	Setting up an enterprise in order to exploit a patent or licence
Actor	Institutional management
Basis	Internal
Information objects	Subsidy obligations; Funding; Decision on type of enterprise; Feasibility study; Collaboration agreement; Evaluation
Valuation	V seven years after end of enterprise or participation by university or UMC
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	For the accounting records that an institution keeps for an enterprise, see process 135 . If an enterprise is regarded as 'special', the institution may elect to retain its establishment (and termination) permanently, in accordance with Section 1.6.3 . Special enterprises are defined as those that develop ground-breaking or innovative products, are particularly successful economically, or promote unique social developments.

Number	75
Core description	Applying for a patent or licence
Process	Applying for a patent
Actor	Institutional management
Basis	Patent Act, Copyright Act Trademark Law, Designs and models law, Neighbouring Rights Act Integrated circuit topography law (chip right), Plant breeder's right, Trade name law
Information objects	Application; Description; Patent; Decision; Analysis; Funding; Agreement; Recommendations;
Valuation	V ten years after end of patent or licence

Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	This also includes brand registration, models, databases, and copyright
Number	76
Core description	Sale of intellectual property
Process	Selling intellectual property
Actor	Institutional management
Basis	Internal
Information objects	Deed of sale; Agreement; Decision
Valuation	V ten years after completion
Other valuation	<ul style="list-style-type: none"> • If conditions attached to sale V seven years after conditions no longer apply • Not taken place V two years after completion
Type of valuation	Indicative
Comments	This includes the sale of data, products developed via research, or enterprises set up to exploit products that have been developed. If the institution regards the property as special, it may be exempted from destruction, in accordance with Section 1.6.3 .

2.5 Patient care - development and implementation of policy

This part deals with the processes for patient care at University Medical Centres.

Number	77
Core description	Patient care policy development
Process	Setting patient care policy
Actor	Institutional management
Basis	Internal
Information objects	Policy document; Decision; Evaluation; Recommendations from notification committee; Recommendations from Medical ethics assessment committee and the Medical Registration Committee; Recommendations from representative advisory council; Evaluation
Valuation	Retention (SA-B3)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Number	78
Core description	Medicines policy
Process	Developing a medicines policy
Actor	Institutional management
Basis	Internal
Information objects	Application; Assessment; Approval; Description; Recommendations from Medicines committee; Notice of information to employees
Valuation	Retention (SA-B3)
Other valuation	<ul style="list-style-type: none"> • Informing doctors and nursing staff V one year after completion • Not taken place V five years after completion
Type of valuation	Indicative
Number	79
Core description	Accreditation of patient care
Process	Requesting accreditation for a healthcare institution
Actor	Institutional management
Basis	Internal policy

Information objects	Application; Decision by accreditor; Self-evaluation; Action plan
Valuation	V one year after end of accreditation
Other valuation	<ul style="list-style-type: none"> • Self-evaluation: Retention (SA-B4) • Not taken place V one year after completion
Type of valuation	Indicative
Comments	A healthcare institution may request accreditation from the Netherlands Institute for Healthcare Accreditation (NIAZ), for example. The retention period is derived from the validity of the accreditation (four years).
Number	80
Core description	Patient medical data
Process	Recording patients' medical data
Actor	Institutional management
Basis	Dutch Civil Code, Section 7:454 paragraph 3; Provision of Medicines Act, Sections 1, third paragraph, and 26, under f, g, and i; European recommendation on Good Clinical Practice for Trials on Medicinal Products in the European Community, EC doc. III/3976/88 final, Article 3.17; Termination of Pregnancy Act; Directive 2010/45/EU on the quality and safety of human organs intended for transplantation; Medical Treatment Contracts Act; Body Material Requirements Decree 2006; Artificial Insemination (Donor Information) Act; Healthcare Quality, Complaints and Disputes Act (WKKGZ)
Information objects	Discharge note; Surgery report; Anaesthesia report; Pathology/anatomy report; First Aid report; Documentation containing details on emergencies and/or medical incidents; Organ donations; Wills
Valuation	V twenty years after last treatment or death or for as long after the expiry of this period as is reasonably necessary to provide the standard of care of a prudent care provider.
Other valuation	<ul style="list-style-type: none"> • Discharge note; Surgery report; Anaesthesia report; emergencies and/or medical incidents; Organ donations V 115 years after birth • Details of admission pursuant to WBOPZ V five years after last treatment • Personal data of accidents involving minors (including X-rays) V 28 years after birth • Providing patient data to healthcare insurer V seven years after completion • Information on terminations of pregnancy V five years after completion • Details on organ donations V thirty years after completion • Artificial insemination donor data V thirty years after completion (or eighty years: see explanatory notes)
Type of valuation	Absolute
Comments	<p>Personal data relating to accidents involving minors (including X-rays) are retained until the patient has reached the age of 28. Personal data that could be of importance to legal proceedings (claims for damages) and hospital complaints procedures should be retained until such time that the proceedings or procedures have been definitively concluded.</p> <p>For an explanation of the retention period for organ donations and artificial insemination, see Section 3.5.2.</p> <p>Notes of incidents or emergencies include information on the nature, facts, time, and names of those involved (WKKGZ Section 10 paragraph 3).</p>

The pathology/anatomy reports cover the following in particular: histology, cytology, and/or autopsy reports.

Research data of patients who have taken part in a medical trial come under [process 72](#) (see also [Section 3.5.2](#)).

Patients and ex-patients may submit a request for their data to be deleted. This comes under [process 163](#).

The retention period for this used to be fifteen years. Because of the Medical Treatment Contracts Act, the retention period has been increased to twenty years.

Number	81
Core description	Investigation into medical incidents
Process	Investigating medical incidents, suicide/suicide attempts, errors, accidents, and near-accidents
Actor	Institutional management
Basis	Healthcare Quality, Complaints and Disputes Act;
Information objects	Notification; Evaluation; Recommendations from notification committee; Register on the use of medicines; Infections register
Valuation	V ten years after completion
Other valuation	<ul style="list-style-type: none"> • Use of medicines V five years after completion • Infections register Retention (SA-B5) • Quality of healthcare register (including medical emergencies and incidents) V twenty years after last treatment or death or for as long after the expiry of this period as is reasonably necessary to provide the standard of care of a prudent care provider. • Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>Medical errors relating to individual patients are entered into the patient's file (process 80) and into a separate register on the quality of the healthcare.</p> <p>The institution should maintain a register on the use of medicines. Cumulative data must be retained: this comes under process 78 as evaluation of policy.</p>

2.6 Operational management - development and implementation of policy

This part describes the processes that support the management of the institution and carrying out of teaching and research activities. These support processes are classified as 'operational management'. It includes student administration, personnel and organisation, finances, communications and housing.

2.6.1 Operational management

This part describes the policy-related processes carried out by an institution for its operational activities, such as taking measures and setting procedures. The sequence used here is first the direction of operational management and then the associated staffing.

Number	82
Core description	Development of operational management policy
Process	Developing and setting policy regarding operational management
Actor	Institutional management
Basis	Internal
Information objects	Policy document; Decision; Evaluation; Work instruction; Recommendations from financial committee; Recommendations from representative advisory council
Valuation	V ten years after period of operation
Other valuation	<ul style="list-style-type: none"> • Evaluation V ten years after completion • Policy in relation to religion and personal beliefs Retention (SA-B3) • Policy in relation to acquisition of art (SA-B3) • Not taken place V five years after completion
Type of valuation	Indicative
Comments	This concerns the development of policy not specifically set out in legislation, but which nonetheless plays a key role in how the work is carried out. Examples include drawing up a general communications plan, setting the powers for external representation of the institutional management, appointments procedures for the management and complaints procedures.
Number	83
Core description	Setting planning and control cycles
Process	Setting the planning and control cycle
Actor	Institutional management
Basis	Internal
Information objects	Planning and control cycle
Valuation	V five years after period of operation
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	84
Core description	Mandates and delegations
Process	Drawing up a mandate or delegation
Actor	Institutional management
Basis	Internal
Information objects	Mandate regulations; Mandate decision
Valuation	V ten years after period of operation
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative

Comments	The valuation is derived from possible mandate decisions that have serious legal consequences, such as the suspension of students.
Number	85
Core description	Personnel policy
Process	Drawing up the personnel policy
Actor	Institutional management
Basis	WHW Section 4.2, 4.5
Information objects	Policy document; Decision; Direction by Ministry of SZW; Recommendations; Evaluation
Valuation	V ten years after period of operation
Other valuation	<ul style="list-style-type: none"> • Evaluation V ten years after completion • Not taken place V five years after completion
Type of valuation	Indicative
Comments	This also includes policy on social provisions for volunteers and participants.
Number	86
Core description	Working conditions policy
Process	Drawing up a working conditions policy
Actor	Institutional management
Basis	Working Conditions Act, Section 3-4
Information objects	Policy document; Decision; Annual plan; Instructions from occupational health and safety service; Evaluation; Policy on hazardous substances; Consent decision and recommendations from representative advisory council
Valuation	V ten years after period of operation
Other valuation	<ul style="list-style-type: none"> • Instructions from occupational health and safety service V five years after period of operation • Policy on hazardous substances V forty years after period of operation • Not taken place V five years after completion
Type of valuation	Indicative
Number	87
Core description	Personnel changes
Process	Taking decisions relating to personnel changes; expanding the workforce
Actor	Institutional management, Management of organisational unit
Basis	Internal
Information objects	Decision
Valuation	V five years after completion
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comment	This process concerns decisions on personnel changes (number of FTEs)
Number	88
Core description	Diversity policy
Process	Drawing up a document regarding equal representation of women and minorities in management functions
Actor	Institutional management
Basis	WHW Section 4.2
Information objects	Policy document; Decision
Valuation	Retention (SA-B3)

Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	Such a document is adopted once every four years and concerns the proposed execution of policy.

2.6.2 Student administration

This part concerns the administrative support of the teaching process. It also includes the measures taken with regard to students in special circumstances. The sequence used is the processes relating to enrolment, progress and financial support, disciplinary measures, termination of enrolment, and administrative acts after termination of enrolment. Absolute retention periods are used with processes related to the collection of student data, because of the purpose limitation imposed by the General Data Protection Regulation.

Number	89
Core description	Enrolment procedures
Process	Drawing up rules of a procedural nature regarding enrolment
Actor	Institutional management
Basis	WHW Section 7.33
Information objects	Enrolment regulations/rules; Decision
Valuation	V five years after period of operation
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	90
Core description	Students' first enrolment
Process	Arranging the first enrolment of students, course participants, external students and observers
Actor	Institutional management
Basis	WHW Chapter 7, titles 2 and 3; Higher Education Application and Selection Regulations
Information objects	Enrolment forms; Notice of prior education to DUO; Prior education diploma; Prior education list of marks; Change of degree programme form; Certificate obtained; Valuation of foreign diploma; Proof of meeting other prior educational entry requirements; Proof of eliminating deficiencies from prior education; Decision on entrance examinations admission; Proof of exemptions; Proof of language, admission, or intelligence test; Proof of admission to draw procedure; Curriculum vitae; Copy of employment agreement; Proof of payment of tuition fees to other institution; Sending student ID card; Registration in BRON; Portfolio; Minor Learning agreement; Letter of recommendation; Letter of motivation; Report of interview; Statement accepting risk of infections; Decision on admission/enrolment; Knowledge embargo exemption
Valuation	V two years after termination of enrolment
Other valuation	<ul style="list-style-type: none"> • Enrolment forms; Proof of payment of tuition fees to other institution; Proof of admission V seven years after enrolment • Knowledge embargo exemption V ten years after termination of enrolment • Not enrolled V one year after completion
Type of valuation	Absolute
Comments	The nominal study duration can be used for the enrolment documents. Personal data which serve only to verify students' identities should be destroyed after the enrolment decision has been taken, in line with the GDPR. The other valuation is determined by the financial documentation

included with the enrolment.

The GDPR states that institutions/education institutions may not retain the following data:

Proof of identity, photographs, and extracts from the Key Register of Persons (BRP).

This data should be destroyed immediately after the enrolment process has been completed.

Number	91
Core description	Enrolment of non-EEA students
Process	Enrolling international students from non-EEA countries
Actor	Institutional management
Basis	Aliens Act 2000, Section 8; Sponsorship: Aliens Decree 2000, Section 4.53, Aliens Regulation Section 4.29 to 31
Information objects	Application for residence permit; confirmation of receipt from IND; Residence permit assessment report; Proof of lawful residence; Learning agreement; Proof of sufficient financial means; Antecedents declaration; Proof of payment; Sponsorship form; Statement accepting risks of infections; Enrolment forms; Proof of payment of tuition fees to other institution; Confirmation of admission; Request for accommodation; Visa application; Knowledge embargo exemption
Valuation	V five years after institution has deregistered the individual concerned from the IND
Other valuation	<ul style="list-style-type: none"> • Enrolment forms; Proof of payment of tuition fees to other institution; Proof of admission: V seven years after enrolment • Assistance with accommodation and visa application: V one year after completion • Knowledge embargo exemption V ten years after termination of enrolment • Not enrolled: V one year after completion
Type of valuation	Absolute
Comments	This process concerns all information objects requested when implementing the Aliens Act. For all 'regular' information objects, see process 90 . For registering non-EEA students' study progress, see process 95 .
Number	92
Core description	Admission assessments
Process	Carrying out admission assessments for a degree programme
Actor	Institutional management
Basis	WHW Sections 7.26, 26a
Information objects	Student's work; Recommendations from admissions board; Notice to student; Decision/Admission decision; Confirmation of admission
Valuation	V two years after completion
Other valuation	<ul style="list-style-type: none"> • Refused V one year after completion • Not taken place V three months after completion
Type of valuation	Indicative
Comments	As this does not involve an assessment of students' exit levels and they will receive a negative binding study advice on the continuation of their studies within the set duration of the study programme if their level turns out to be insufficient anyway, the retention period has been set at that for examinations.

Number	93
Core description	Enrolment and re-enrolment of students in an academic year
Process	Organising the annual enrolment and re-enrolment of students on a degree programme
Actor	Institutional management
Basis	WHW Chapter 7, title 3; paragraphs 1a and 2
Information objects	Re-enrolment request; Reminder; Student enrolment; Authorisation for collection of tuition fees; Proof of enrolment
Valuation	V seven years after enrolment
Other valuation	<ul style="list-style-type: none"> • Re-enrolment request; Reminder V one year after enrolment • Not enrolled V one year after completion
Type of valuation	Absolute
Comments	The retention period is derived from the financial consequences of the enrolment, especially the payment authorisation.
Number	94
Core description	Enrolment quota and decentralised selection
Process	Limiting enrolments on the basis of the available teaching capacity
Actor	Institutional management
Basis	WHW Chapter 7, title 3, paragraphs 4 and 4a; Higher Education Application and Selection Regulations
Information objects	Fixed quota; Selection procedure; Selection criteria; Reasoned notification to minister
Valuation	V seven years after modification
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	The Ministry of Education, Culture and Science retains the most important information permanently (see 2018 Generic OCW selection list, process 10.1).
Number	95
Core description	Non-EEA students' study progress
Process	Monitoring the study progress of non-EEA students
Actor	Institutional management
Basis	Aliens Regulation Section 4.29
Information objects	Registration of study progress; Reason for insufficient progress; Proof of sufficient financial means
Valuation	V five years after institution has deregistered the individual concerned from the IND
Type of valuation	Absolute
Number	96
Core description	Financial support for students
Process	Providing financial support for students (FOS)
Actor	Institutional management
Basis	WHW Sections 7.51, 7.51a, 7.51b, 7.51c, 7.51d, 7.51e, 7.51f, 7.51g, 7.51h
Information objects	Application for student profiling fund; Application for reduction in tuition fees; Decision
Valuation	V seven years after completion
Other valuation	Rejected V one year after completion
Type of valuation	Absolute
Comments	Claims for financial support are made using the profiling fund; see process 29 for the setting up of this fund. A reduction in tuition fees may also be

given.

Number	97
Core description	Special provisions for students
Process	Making special provisions for students with an impairment (physical or otherwise)
Actor	Examinations board, Institutional management, or Management of organisational unit
Basis	WHW Sections 7.12b, 7.13
Information objects	Statement of impairment; Granting of special provision
Valuation	V one year after end of special provision
Other valuation	Rejected V one year after completion
Type of valuation	Indicative
Comments	This concerns the making of provisions for individual students. The valuation is linked to the duration of the provision.
Number	98
Core description	Suspension of students
Process	Suspending a student
Actor	Institutional management
Basis	WHW Section 7.57h
Information objects	Warning; Decision; Notification; Student's view
Valuation	V ten years after disqualification
Other valuation	<ul style="list-style-type: none"> • Warning V two years after completion • Not taken place V two years after completion
Type of valuation	Indicative
Comments	This concerns the denial of access to the buildings and grounds of the institution, either wholly or partly, for a period of no more than one year. Because this concerns a decision with possibly serious legal consequences, the valuation is set at ten years.
Number	99
Core description	Student refusal or removal
Process	Refusing students for or removing them from a degree programme
Actor	Institutional management
Basis	WHW Sections 7.12b, 7.37, 7.42a, 7.57h
Information objects	Notification; Recommendations from examinations board or dean; Decision; Student's view; Denial of access
Valuation	V five years after refusal or removal
Other valuation	Not taken place V two years after completion
Type of valuation	Indicative
Comments	Students are refused or removed if there is a reasonable fear that they will abuse, or have abused, their enrolment and associated rights, or if they have behaved in a way that is incompatible with the professional practice associated with the degree programme (judicium abeundi/unsuitability).
Number	100
Core description	Termination of students' enrolment
Process	Terminating the enrolment of students, course participants, external students and observers
Actor	Institutional management
Basis	WHW Section 7.42; Aliens Regulation, Section 4.29

Information objects	Request; Registration in BRON; Background
Valuation	V two years after termination of enrolment
Other valuation	<ul style="list-style-type: none"> Termination of enrolment of non-EEA students V five years after institution has deregistered the individual concerned from the IND Enrolment not terminated V one year after completion
Type of valuation	Absolute

2.6.3 Personnel

This part deals with personnel management processes (human resources). The sequence used is the processes for administrative management, absenteeism and benefits, objections and appeals, and internships.

Number	101
Core description	Job applications
Process	Processing job vacancy applications
Actor	Management of organisational unit
Basis	Internal
Information objects	Job application; Curriculum vitae; Rejection; Assessment; Psychological examination
Valuation	<ul style="list-style-type: none"> V four weeks after completion, for rejected applications V one year after completion, for rejected applications, if permission for longer retention has been granted.
Type of valuation	Absolute
Comments	This process concerns the job application documents of unsuccessful applicants. The application of the employee actually taken on is added to their personnel file. The rejected applications may be retained for one year, provided the applicant in question has given their permission for this. If they have not, then the applications should be destroyed upon completion of the procedure. The period of four weeks is based on the possibility of objections being raised. This also applies to assessments and psychological examinations held during the application process. Although the Personal Data Protection Act exemption decision no longer applies, it has been decided to uphold the retention period.

Number	102
Core description	Appointment of personnel
Process	Appointing personnel
Actor	Management of organisational unit
Basis	WHW Section 4.2 paragraph 1; Directive (EU) 2016/801; Aliens Regulation Section 4.29
Information objects	Job application; Curriculum vitae; Identity document; Appointment and dismissal; Salary scale; Change of position; Working hours; Posting/transfer; Payroll tax statement; Salary; Knowledge embargo exemption; Dismissal; Recommendation from Employee Insurance Agency (UWV)
Valuation	V ten years after termination of employment
Other valuation	<ul style="list-style-type: none"> Payroll tax statement and identity document V five years after termination of employment Temporary employees V seven years after end of agreement Foreign employee visa V five years after institution has deregistered the individual concerned from the IND Knowledge embargo exemption V ten years after expiry Appointment not taken place V one year after completion

Type of valuation	Indicative
Comments	In view of the GDPR, it is advised that the following information be destroyed one year after the termination of employment: - Assessments and psychological examinations - CV, Application letter, Recommendations, Certificate of Conduct
Number	103
Core description	Appointment of professor
Process	Appointing a professor
Actor	Institutional management
Basis	Internal
Information objects	Appointment; Motivation; Recommendation; Assignment; Institution
Valuation	Appointments Committee or governing board
Other valuation	Retention (SA-B3) <ul style="list-style-type: none"> • Appointments Committee (establishment and appointment of members) V ten years after end of appointment • Not taken place V one year after completion
Type of valuation	Indicative
Comments	This process concerns only the appointment of a professor or a professor occupying a special chair. For correspondence on agreements about employment, leave, salary, and assessment, see processes 101, 102, and 104 to 108. For correspondence concerning the setting up of a chair, see process 67 .
Number	104
Core description	Agreements with employees
Process	Making agreements with employees
Actor	Management of organisational unit
Basis	WHW Section 4.2 paragraph 1
Information objects	Leave; Allowance; Reimbursement; Training and guidance plan; Ancillary positions; Assistance with legal proceedings related to the Individual Health Care Professions Act; Permission for private practice
Valuation	V seven years after period of operation
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	105
Core description	Staff evaluation and assessment
Process	Evaluating and assessing an employee
Actor	Management of organisational unit
Basis	WHW Section 4.2 paragraph 1, Section 4.5
Information objects	Disciplinary measure; Assessment or performance interview; Medical examination; Aggression directed at staff; Risk inventory and evaluation; Occupational health and safety incident
Valuation	V ten years after completion
Other valuation	<ul style="list-style-type: none"> • Assessment or performance interview V five years after completion • Risk inventory and evaluation relating to hazardous substances V forty years after completion
Type of valuation	Indicative
Comments	This process also applies to investigations into academic integrity. Special cases relating to academic integrity come under the exceptions category (see Section 1.6.4). If hazardous substances are involved with an occupational health and

safety incident, [process 132](#) applies. A register of occupational health and safety incidents must be kept.

Institutions may draw up their own guidelines on destroying information objects regarding assessments and performance earlier or in the interim. For the medical data of employees that is retained by an occupational health and safety service or occupational physician, there is a retention period of twenty years after the closing of the file.

Number	106
Core description	Salary administration
Process	Running the salary administration
Actor	Management of organisational unit
Basis	State Taxes Act, Section 52
Information objects	Salary administration, including: expense claims, advance payments, attachments and deductions, union fees, bonuses
Valuation	V seven years after verification
Other valuation	<ul style="list-style-type: none"> • Attachment of earnings immediately after expiry • Time recording: V one year after completion
Type of valuation	Absolute
Comments	The absolute valuation of seven years is derived from the fact that the salary administration includes personal data, but is also used for financial accountability purposes.
Number	107
Core description	Legal positions of employees
Process	Ensuring the legal position of employees
Actor	Management of organisational unit
Basis	WHW Section 4.5
Information objects	Documentation for the ABP or Loyalis
Valuation	V ten years after termination of employment
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	The valuation is derived from the retention obligation on the ABP in relation to pension rights. The period is based on possibly serious legal consequences of the administration, resulting from the relationship between the institution and employee.
Number	108
Core description	Administration of absenteeism
Process	Keeping administrative records regarding absenteeism and the rehabilitation of a member of staff
Actor	Management of organisational unit
Basis	Eligibility for Permanent Incapacity Benefit (Restrictions) Act
Information objects	Sickness report; Notification of recovery; Action plan; Evaluation; Problem analysis; Decision on WIA benefit
Valuation	V two years after completion
Other valuation	<ul style="list-style-type: none"> • Implementation of Eligibility for Permanent Incapacity Benefit (Restrictions) Act V five years after completion or two years after termination of employment; • Decision on WIA benefit V seven years after end of benefit
Type of valuation	Indicative
Comments	The administrative records of sickness and recovery notifications should be destroyed after two years. For cases of sickness where the Eligibility for Permanent Incapacity Benefit (Restrictions) Act plays a role, the retention

period is five years, because of the history and file structure, with an additional period of two years after termination of employment, unless a longer period of retention is prescribed by law. The GDPR has been taken into account here.

If hazardous substances are involved with an occupational health and safety incident, [process 132](#) applies.

Number	109
Core description	Non-statutory unemployment benefit payments
Process	Providing non-statutory unemployment regulations
Actor	Management of organisational unit
Basis	Non-Statutory Unemployment Regulation of the Dutch Universities (BWNU) and Non-Statutory Unemployment Regulation of University Medical Centres (BWUMC)
Information objects	Calculation of duration of appointment; Declaration of right to benefit; Termination of right to benefit
Valuation	V seven years after period of operation
Other valuation	Rejected V two years after completion
Type of valuation	Indicative
Comments	The valuation is derived from consequences of the documentation for the accounting records.
Number	110
Core description	Objection and appeals by employees
Process	Dealing with an objection against a decision concerning an employee
Actor	Institutional management
Basis	General Administrative Law Act, Sections 4.19 and 4.20
Information objects	Objection; Report; Ruling by sub-district court
Valuation	V ten years after completion
Other valuation	Not taken place V one year after completion
Type of valuation	Absolute
Comments	The valuation is derived from possibly serious consequences of a ruling for an employee. Pursuant to the provisions in the General Data Protection Regulation, the valuation for the institution is absolute.
Number	111
Core description	Internal internships
Process	Having internal trainees and graduates
Actor	Management of organisational unit
Basis	Internal
Information objects	Internship agreement; Identity document; Internship allowance
Valuation	V two years after end of internship
Other valuation	<ul style="list-style-type: none"> • Internship allowance V seven years after completion • Identity document in the case of an internship allowance V five years after the end of the internship • Rejected V one year after completion
Type of valuation	Absolute
Comments	This concerns the personnel documents relating to an internship carried out at the institution. There is a separate process for the information objects relating to the actual execution of the internship. See also Section 3.6.6 .

2.6.4 Organisation

This part deals with the processes relating to support for the organisation with procurement and legal matters, the setting up of committees and working groups, and setting powers, among other things. The sequence used is the organisation as a whole, committees and working groups/project working groups, powers, procurement, complaints, and legal matters.

Number	112
Core description	Memberships
Process	Having membership of an association, cooperation, or mutual insurance association
Actor	Institutional management
Basis	Dutch Civil Code, Book 2 title 2-3
Information objects	Membership
Valuation	V seven years after period of operation
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	The valuations are based on financial consequences of the membership. Participations are not covered here, as they come under different legal arrangements.
Number	113
Core description	Setting up committees and working groups
Process	Setting up or disbanding internal steering committees, working groups, and committees
Actor	Institutional management
Basis	Internal
Information objects	Task; Regulations; Membership list; Final report; Decision on implementation of work for third parties; Recognition of committee
Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Ad hoc committees and associated regulations V five years after disbandment • Appointment of members V seven years after end of appointment • Steering committee or working group V five years after disbandment • Not taken place V five years after completion
Type of valuation	Indicative
Comments	Committees to be retained include the programme committee, the examinations board, the medical and scientific advisory committees, the notification committee, the complaints committee. The retention period depends on the nature of the work. If the products of the relevant working group lead to policy changes, then they are incorporated into the policy-making processes. See the explanatory notes in Section 3.6.4 .
Number	114
Core description	Third-party plans
Process	Assessing third-party plans
Actor	Institutional management
Basis	Internal
Information objects	Plan; Budget; Annual Statement of Accounts; Decision; Response; Consent decision by representative advisory council
Valuation	V seven years after completion
Other valuation	<ul style="list-style-type: none"> • If no effect on the institution V two years after completion • Not taken place V one year after completion

Type of valuation	Indicative
Comments	This concerns, among other things, plans by research schools and institutions, joint implementation bodies, government and semi-public institutions, umbrella organisations, and other education institutions.
Number	115
Core description	Carrying out projects
Process	Carrying out projects and implementing special regulations
Actor	Institutional management
Basis	Internal
Information objects	Project proposal; Project assignment/approval; Project contract; Management reports; Interim reports; Final report
Valuation	V ten years after completion
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Comments	This concerns projects that do not come under other processes in this selection list. The valuation is based on projects with actual consequences for the composition or the work of the institution. Projects of a special nature may be retained permanently, in accordance with Section 1.6.3 . Projects of a special nature are those that are important or specific to the university or UMC. The other valuation relates to documentation that could be related to the accounting records. For new construction and building renovation projects, see process 151 . For research projects, see process 72 .
Number	116
Core description	Granting authorisations
Process	Granting and revoking authorisations and powers of attorney to employees or third parties.
Actor	Institutional management
Basis	Dutch Civil Code, Book 3 title 3
Information objects	Authorisation or power of attorney; System privileges
Valuation	V seven years after period of operation
Other valuation	<ul style="list-style-type: none"> • System privileges V one year after end of period of operation • Not taken place V one year after completion
Type of valuation	Indicative
Comments	The valuation relates to the financial consequences of the authorisation. For applications for authorisations with an external party, see process 117 .
Number	117
Core description	Requesting certificates and authorisations
Process	Requesting a certificate or authorisation
Actor	Institutional management
Basis	Internal and the Experiments on Animals Act
Information objects	Request; Certificate; Authorisation
Valuation	V one year after period of operation
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	This process concerns requesting certificates or authorisations from other institutions, such as an occupational health and safety certificate or recognition as a performer of animal experiments (institution permit). For the granting of authorisations, see process 116 .

Number	118
Core description	Appointment of officers (without a contract of employment)
Process	Appointing and dismissing officers
Actor	Institutional management
Basis	Internal
Information objects	Appointment; Decision
Valuation	V seven years after period of operation
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	This concerns appointments of those without a contract of employment, such as confidential advisor, data protection officer, prevention officer, internal mediator, or member of the company emergency response team.
Number	119
Core description	Awarding prizes
Process	Awarding prizes
Actor	Institutional management
Basis	Internal
Information objects	Nomination; Recommendation; Awarding; Regulations; Honorary doctorate
Valuation	Retention (SA-B3)
Other valuation	<ul style="list-style-type: none"> • Prize or award in research field (valorisation) V seven years after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	Prizes awarded for research are destroyed as this is a frequent occurrence and not often that remarkable. Prizes awarded for other areas may be retained permanently. If the organisation decides that a prize or award is particularly noteworthy, it may be retained in accordance with Section 1.6.3 .
Number	120
Core description	Procurement of products and services
Process	Dealing with the procurement of products and services
Actor	Institutional management
Basis	Public Procurement Act 2012
Information objects	Specifications; Tender; Decision document; Motivation of choice; Agreement
Valuation	V seven years after period of operation
Other valuation	<ul style="list-style-type: none"> • Tender; Decision document; Motivation of choice: V five years after completion • Rejected quotes V one year after completion • Rejected quotes for European tender V three years after completion • Art procurement Retention (SA-B3) • Not taken place V one year after completion
Type of valuation	Indicative
Comments	The process for the procurement of products and services also concerns the execution of tendering procedures. The valuation is based on the financial obligations and rights/guarantees emanating from the agreement.
Number	121
Core description	Agreements
Process	Entering into an agreement or contract

Actor	Support services
Basis	Internal
Information objects	Agreement
Valuation	V one year after period of operation
Other valuation	<ul style="list-style-type: none"> • Agreement with financial aspects V seven years after period of operation • Agreement between organisational units V five years after period of operation • Agreement with confidentiality V ten years after period of operation • GDPR processing agreements V five years after period of operation • Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>This is a generic process for agreements that cannot be valued under a specific process. For agreements and contracts related to procurements, see process 120.</p> <p>Agreements with confidentiality are retained for ten years, because of checks on implementation of the confidentiality aspects. These agreements usually occur in research projects (see process 71).</p>
Number	122
Core description	Complaints
Process	Dealing with complaints
Actor	Institutional management
Basis	For students: WHW Section 7.59b, General Administrative Law Act title 9.1 For patients: General Administrative Law Act title 9.1; WKKGZ For the Inspectorate of Education: Education Inspection Act, Section 23 For whistleblowers: House for Whistleblowers Act
Information objects	Complaint; Confirmation of receipt; Ruling; Recommendations from committee; Inspection report
Valuation	V five years after completion
Other valuation	<ul style="list-style-type: none"> • Confirmation of receipt V one year after sending • Report by whistleblowers, complaints about undesirable behaviour V ten years after completion • Complaints by patients V seven years after completion • Complaints submitted to the Inspectorate of Education or the Regional disciplinary tribunal V ten years after completion • Not dealt with V one year after completion
Type of valuation	Indicative
Comments	<p>The Executive Board or the Board of Directors and the directors of faculties, divisions, or academies deal with complaints from students, employees, and third parties. Dealing with reports by whistleblowers also comes under this process. The process covers complaints submitted by the institution about the Inspectorate of Education as well. For investigations by the Inspectorate of Education following complaints or reports, see process 25.</p>
Number	123
Core description	Disputes
Process	Dealing with disputes
Actor	Institutional management
Basis	WHW Section 7.63a
Information objects	Objection; Assessment of amicable settlement; Recommendations; Ruling
Valuation	V ten years after completion
Type of valuation	Absolute

Comments	The valuation of destruction after ten years is based on possible legal consequences of the recommendations or decision. This process applies to every type of appeal and objection, except objections from employees (process 110), and to appeals dealt with by the CBE (process 64).
Number	124
Core description	Reporting crimes against a person
Process	Dealing with or reporting crimes against a person
Actor	Institutional management
Basis	Students: WHW Section 1.20 and WEB Section 1.3.8 Patients: WKKGZ
Information objects	Statement or report; Report of meeting; Judgement of inspectorate or relevant body; Advice by relevant body
Valuation	V ten years after completion
Other valuation	Not reported V one year after completion
Type of valuation	Indicative
Comments	This concerns dealing with reports and complaints about or against employees. Reporting such crimes as destruction of property comes under process 130 .
Number	125
Core description	Reporting code for domestic violence and child abuse
Process	Drawing up a reporting code for domestic violence and child abuse.
Actor	Institutional management
Basis	WHW Section 1.21; WEB Section 1.3.9
Information objects	Reporting code; Advice from relevant bodies
Valuation	V ten years after period of operation
Other valuation	Not confirmed V one year after completion
Type of valuation	Indicative
Comments	Education institutions are obliged to have a reporting code for domestic violence and child abuse that describes how an institution must act if there are suspicions of domestic violence or child abuse.
Number	126
Core description	Liability claims
Process	Submitting or dealing with claims for damages by the institution
Actor	Institutional management
Basis	Dutch Civil Code, Book 6 title 3
Information objects	Liability claim; Evidence; Decision; Legal proceedings
Valuation	V seven years after completion
Other valuation	Not dealt with V one year after completion
Type of valuation	Indicative
Comments	The valuation is derived from financial processing and administration of the liability claim.
Number	127
Core description	Monitoring the organisation
Process	Undergoing and carrying out monitoring of the organisation
Actor	Institutional management; Board of organisational unit
Basis	Internal
Information objects	Audit report; Inspection; Assessment
Valuation	V ten years after completion

Universities and University Medical Centres 2020 Selection List

Other valuation	<ul style="list-style-type: none"> • Efficiency analysis Retention (SA-B4) • Not taken place V one year after completion
Type of valuation	Indicative
Comments	For inspections or audits by an inspectorate, see process 25 .
Number	128
Core description	Information management
Process	Carrying out information management
Actor	Institutional management
Basis	Public Records Act and internal policy
Information objects	Decision on archive replacement; Transfer of archives; Sale of archives; Information management policy; Destruction list; Inventory; Information policy; Data migration or conversion; Loan administration
Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Day-to-day archive activities V one year after completion • Loan administration V one year after end of loan • Data migration or conversion of destructible data V one year after destruction of data in question • Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>Day-to-day activities are defined as the creation and lending out of files, as well as overviews of the records of the mail, etc.</p> <p>Data migration of conversion must be retained as long as the data is present. If the data have been destroyed (because it is no longer important), the data concerning the migration or conversion may also be destroyed. If it concerns data that has to be retained permanently, the data concerning the migration or conversion must also be retained.</p> <p>The retention of the administration of users and borrowers (loan administration) of archives or collections (museums, libraries, etc.) of universities and UMCs also comes under this process.</p>
Number	129
Core description	Management and maintenance of information systems
Process	Managing and maintaining information systems
Actor	Institutional management
Basis	Internal; Government Information Security Baseline; Electronic data processing by healthcare providers decree (Decision by the Minister for Medical Care of 27 June 2019, number 1529221-190512-WJZ)
Information objects	Update software; Functionality modification; Third Party Memorandum;
Valuation	V one year after completion
Other valuation	<ul style="list-style-type: none"> • Third Party Memorandum V ten years after completion • Logging data six months • Logging data for accessing electronic patient record five years after completion • Not taken place V one year after completion
Type of valuation	Indicative
Number	130
Core description	Reporting crimes
Process	Reporting crimes
Actor	Institutional management
Basis	Internal
Information objects	Report; Response of how report has been dealt with

Universities and University Medical Centres 2020 Selection List

Valuation	V seven years after completion
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	Crimes/sexual offences against a person come under process 124 .
Number	131
Core description	Advising third parties
Process	Advising a third party, whether requested or not, by the institution
Actor	Institutional management
Basis	Internal
Information objects	Request; Advice
Valuation	V five years after completion
Other valuation	<ul style="list-style-type: none"> • Advising minister regarding education policy or patient care: Retention (SA-B3) • Advice to third parties that has a direct effect on the policy of the university or UMC: Retention (criterion 5) (SA-B3) • Not taken place V one year after completion
Type of valuation	Indicative
Number	132
Core description	Administration of hazardous substances
Process	Keeping administrative records of hazardous substances
Actor	Institutional management
Basis	Working Conditions Decree, Section 4.10c; Radiation Protection (Basic Safety Standards) Decree, Section 7.16
Information objects	Report of contact with hazardous substances; Report; Details of hazardous substances
Valuation	V forty years after completion
Other valuation	Exposure to radiation V thirty years after completion or 75 years after birth
Type of valuation	Absolute
Comments	<p>This also covers the appointment and dismissal of employees where contact with hazardous substances is involved.</p> <p>The details regarding contact with hazardous substances must be recorded in a register.</p>
Number	133
Core description	Licences
Process	Applying for, amending, and revoking licences
Actor	Management of organisational unit
Basis	Environmental Permitting (General Provisions) Act, Section 2.4; Environmental Management Act, Chapter 8; Experiments on Animals Act, Section 10a (project licence); Special Medical Procedures Act; Nagoya protocol (Regulation EU 511/2014)
Information objects	Application; Drawing; Technical details; Licence; Refusal
Valuation	V five years after period of operation
Other valuation	<ul style="list-style-type: none"> • Licence for hazardous substances V thirty years after period of operation • Licence for medical procedures V ten years after period of operation • Licence for genetically modified organisms V twenty years after period of operation • Denied/Not taken place V one year after completion
Type of valuation	Indicative

2.6.5 Finances

This section deals with the processes on financial reporting and accountability. The sequence used is administration, budget, accountability, and reporting, financial support received and provided, and insurance.

Number	134
Core description	Accounting records
Process	Managing and carrying out accounting records
Actor	Support services
Basis	WHW Section 2.17, State Taxes Act, Section 52 paragraph 4
Information objects	Invoice; Cash book; Profit and loss account; Bank statements; Ledger; Payment arrangements; Overviews; Checks; Taxes: Information to the minister
Valuation	V seven years after completion
Other valuation	Invoices concerning the disposal and acquisition of immovable property V ten years after completion
Type of valuation	Indicative

Number	135
Core description	Accounting records of enterprise
Process	Managing and carrying out the accounting records of an enterprise
Actor	Support services
Basis	State Taxes Act, Section 52 paragraph 4
Information objects	Invoice; Profit and loss account; Payment arrangements; Overviews; Checks; Taxes; Decision on remission
Valuation	V seven years after completion, unless agreed otherwise or required for accountability purposes
Type of valuation	Indicative
Comments	For establishing an enterprise, see process 74 .

Number	136
Core description	Monetary loans
Process	Entering into, amending, or repaying monetary loans
Actor	Institutional management
Basis	State Taxes Act, Section 52 paragraph 4
Information objects	Agreement; Repayment; Termination
Valuation	V seven years after repayment or termination
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative

Number	137
Core description	Investing funds
Process	Investing funds in savings or investment accounts
Actor	Institutional management
Basis	State Taxes Act, Section 52 paragraph 4
Information objects	Agreement; Statement of funds; Statement of changes; Dividend voucher
Valuation	V seven years after termination
Other valuation	<ul style="list-style-type: none"> Statement of funds; Statement of changes; Dividend voucher V seven years after completion Not taken place V one year after completion
Type of valuation	Indicative

Universities and University Medical Centres 2020 Selection List

Number	138
Core description	Budgets
Process	Setting a budget
Actor	Institutional management
Basis	WHW Section 2.8; WTZi Section 15
Information objects	Budget/long-term budget; Annual dissemination to research institutes/schools; Recommendations from Medicines committee
Valuation	Retention (SA-B1)
Other valuation	<ul style="list-style-type: none"> • Budgets of organisational units, research institutes/schools; Annual dissemination: V ten years after completion • Not confirmed V two years after completion
Type of valuation	Indicative
Comments	<p>Only the budget for the organisation as a whole should be retained permanently. Other budgets may be destroyed after ten years. The valuation for these budgets is set at the same valuation as that for financial reporting, for the sake of the completeness of the context in which they appear. Because the budget also relates to the financial management of commercial real estate, a standard period of ten years is used for internal consultation. Section 1.6.3 of the introduction contains an explanation of this. For the annual statement of accounts, see process 16.</p>
Number	139
Core description	Framework memorandum
Process	Drawing up a framework memorandum
Actor	Institutional management
Basis	Internal
Information objects	Framework letter; Spring memorandum; Autumn memorandum
Valuation	V ten years after completion
Other valuation	Not confirmed V one year after completion
Type of valuation	Indicative
Comments	<p>Because the memorandums also relate to the financial management of commercial real estate, a standard period of ten years is used for internal consultation. Section 1.6.3 of the introduction contains an explanation of this.</p>
Number	140
Core description	Management reports
Process	Adopting management reports
Actor	Management of organisational unit
Basis	Internal
Information objects	Management reports; Management letter; Management review
Valuation	V ten years after adoption
Other valuation	Not confirmed V one year after completion
Type of valuation	Indicative
Comments	<p>Because of the internal accountability function, the valuation is set at the same valuation as that for financial reporting, in case the reports relate to the financial management of commercial real estate.</p>
Number	141
Core description	Government grant
Process	Receiving the government grant
Actor	Institutional management
Basis	WHW Section 1.17 and Chapter 2 title 2; State Taxes Act, Section 52

Universities and University Medical Centres 2020 Selection List

Information objects	Funding letter; Granting; Audit opinion; Agreement on spending
Valuation	V seven years after adoption
Other valuation	<ul style="list-style-type: none"> • Agreement on spending V seven years after termination • Not taken place V one year after completion
Type of valuation	Indicative
Number	142
Core description	Grant applications
Process	Applying for (additional) funding and grants
Actor	Institutional management
Basis	General Administrative Law Act, title 4.2
Information objects	Application, including information requested; Assessment; Provision; Accountability; Audit; Nagoya protocol statement of care
Valuation	V seven years after adoption
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	Grant providers may demand different retention periods. Seven years is the minimum retention period here, because of the need for financial checks. 'Adoption' refers in this case to the definitive adoption of the grant, following the establishment of accountability. If no accountability is needed, V seven years after completion is sufficient.
Number	143
Core description	European research grants
Process	Applying for European grants
Actor	Institutional management
Basis	Specific ESF grant scheme
Information objects	Application; Assessment; Decision; Accountability;
Valuation	V ten years after end of grant programme
Other valuation	Rejection V one year after completion
Type of valuation	Absolute
Comments	This concerns solely European grants. According to regulations in force at the time of the adoption of the selection list, the documentation associated with European grants should be retained for up to seven years after the current grant scheme. The scheme may also be extended by three years. The current general scheme, at the time of the adoption of the selection list, is that from 2014-2020, by which a minimum retention period of up to 31 December 2030 must be applied. Separate ministerial decisions may be taken in respect of each scheme regarding the retention periods that deviate from the aforementioned retention period.
Number	144
Core description	Grants for third parties
Process	Awarding grants to or sponsoring third parties
Actor	Institutional management
Basis	State Taxes Act, Section 52 paragraph 4
Information objects	Application; Agreement; Accountability
Valuation	V seven years after adoption
Other valuation	Rejected V one year after completion
Type of valuation	Indicative
Comments	This also includes the awarding of scholarships and subsidising valorisation activities. Institutions may demand different retention periods. Seven years

is the minimum retention period here, because of the need for financial checks. 'Adoption' refers in this case to the definitive adoption of the subsidy, following the establishment of accountability. If no accountability is needed, V seven years after completion is sufficient.

Number	145
Core description	Managing insurance policies
Process	Taking out insurance policies
Actor	Support services
Basis	Dutch Civil Code, Book 7 title 17
Information objects	Agreement; Insurance policy; Appendices; Registration of object
Valuation	V seven years after period of operation
Other valuation	<ul style="list-style-type: none"> • Registration of object V one year after incorporation into policy • Not taken place V one year after completion
Type of valuation	Indicative

Number	146
Core description	Gifts and legacies
Process	Dealing with a gift or legacy that the organisation receives or provides
Actor	Institutional management
Basis	Internal
Information objects	Agreement; Deed; Decision
Valuation	Retention (SA-B3)
Other valuation	<ul style="list-style-type: none"> • Donation of superfluous medical material to third party V seven years after completion • Not taken place V five years after completion
Type of valuation	Indicative

2.6.6 Communication

This part concerns the processes relating to – mostly external – communications by the institution. The sequence used is the setting of the corporate identity, and the planning and implementation of communication messages.

Number	147
Core description	Corporate identity
Process	Setting the corporate identity
Actor	Institutional management
Basis	Internal
Information objects	Decision on corporate identity; Corporate identity manual
Valuation	Retention (SA-B3)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative

Number	148
Core description	Announcements
Process	Publishing announcements, including press releases
Actor	Management of organisational unit
Basis	Internal
Information objects	Announcement; Press release; Website

Valuation	Retention (SA-B4)
Other valuation	<ul style="list-style-type: none"> • Policy announcements: see the retention period for the relevant process • Website Retention (SA-B4): see Comments • Internal communication V one year after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>This concerns official announcements by the institution that are partly able to reconstruct its actions in general terms.</p> <p>For retention of the website, see the National Archives' 'Guideline on archiving government websites' (January 2019).</p> <p>At the time of drawing up this selection list, there were no guidelines or best practices for valuating and retaining social media. This section will be expanded further in the future.</p>
Number	149
Core description	Providing information
Process	Providing information to third parties
Actor	Institutional management
Basis	Internal
Information objects	Information; WOB request
Valuation	V one year after completion
Other valuation	<ul style="list-style-type: none"> • WOB request V two years after completion
Type of valuation	Indicative
Comments	<p>This process is intended as a generic process for providing information to third parties (not students).</p> <p>For providing information to:</p> <ul style="list-style-type: none"> • students/prospective students, see process 51. • Details about laboratory animals, see process 72. • Patients' medical data to healthcare insurance companies, see process 80
Number	150
Core description	Organising an event
Process	Organising an event
Actor	Institutional management
Basis	Internal
Information objects	Programme; Evaluation; Photos; Visual material; Speech
Valuation	V seven years after completion
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Comments	<p>This includes conferences, emergency drills, events, symposiums, anniversaries of institutes, and special occasions.</p> <p>An institution may decide to keep certain information objects from special events and occasions, such as the opening of the academic year, the anniversary of the institution, or visits by heads of state.</p>

2.6.7 Accommodation

This part contains the processes regarding the use and maintenance of the buildings and sites of the institution. The sequence used is building and changing buildings, planning and carrying out maintenance, and the disposal of buildings.

Number	151
Core description	New building or renovation projects
Process	Carrying out new building or renovation projects
Actor	Institutional management
Basis	Internal
Information objects	Project plan; Design; Specifications; Contract drawing; As-built drawing; Technical description; Decision; Agreement; Construction supervisor's report; Evaluation report; Construction report; Hazardous substances; Project administration
Valuation	V ten years after termination of use
Other valuation	<ul style="list-style-type: none"> • Weekly statements; Construction meeting; List of instalments; Drafts; Tender; Timetable; Work meeting; Accounting records; Construction supervisor's report V ten years after completion. • Recommendations from representative advisory body V five years after completion • Not taken place V five years after completion
Type of valuation	Indicative
Comments	For licences, see process 133 . See also the process for the administration of hazardous substances (132) for areas of concern with information objects related to hazardous substances. For the retention of documents relating to the special character of a building, see Section 1.6.3 of the Introduction and Section 3.6.1 .
Number	152
Core description	Applying for listed building status
Process	Applying for listed building ('Rijksmonument') status
Actor	Institutional management
Basis	Policy rule on designating listed buildings and amendments to the Heritage Act register of listed buildings
Information objects	Application with description: Decision
Valuation	Retention (SA-B3)
Other valuation	Not taken place V five years after completion
Type of valuation	Indicative
Number	153
Core description	Accommodation policy
Process	Drawing up policies on accommodation
Actor	Institutional management
Basis	Internal
Information objects	Accommodation plan; Policy; Allocation of space
Valuation	Retention (SA-B3)
Other valuation	<ul style="list-style-type: none"> • Allocation of space V five years after period of operation • Not taken place V five years after completion
Type of valuation	Indicative
Comments	This concerns the options for the institution's accommodation as a whole. For policy regarding the use of the accommodation, see process 82 'Development of operational management policy'.
Number	154
Core description	Maintenance planning
Process	Drawing up a maintenance plan
Actor	Support services
Basis	Internal

Information objects	Maintenance plan; Emergency plan
Valuation	V five years after period of operation
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative
Number	155
Core description	Building maintenance
Process	Maintaining buildings, grounds and systems
Actor	Support services
Basis	Internal
Information objects	Maintenance agreement; Assignment; Damage reports
Valuation	V ten years after completion
Other valuation	<ul style="list-style-type: none"> • Repairs; minor repairs; Annual and regular maintenance V seven years after completion • Damage report V five years after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	This concerns the scheduling and carrying out of maintenance. In the case of major alterations, the maintenance may involve a guarantee period of ten years. The valuation is based on this. For renovation work, see process 151 .
Number	156
Core description	Purchase and sale of immovable property
Process	Acquiring and selling buildings and grounds
Actor	Institutional management
Basis	Turnover Tax Act, Section 34a; Care Institutions (Accreditation) Act (WTZi)
Information objects	Deed of transfer; Title deed; Financial documentation; Information and approval from the Committee for the Restructuring of Hospitals
Valuation	V ten years after use
Other valuation	<ul style="list-style-type: none"> • Deed Retention (SA-B3) • Financial documentation V nine or ten years after commencement of use • Information and approval from Committee for the Restructuring of Hospitals V ten years after completion • Not taken place V five years after completion
Type of valuation	Indicative
Comments	See Section 1.6.3 of the introduction for more information on retention periods for financial documentation in relation to commercial real estate. Data concerning purchases and sales is also retained by the Land Registry.
Number	157
Core description	Business rights
Process	Obtaining business rights
Actor	Institutional management
Basis	Dutch Civil Code, Book 5
Information objects	Agreement, Deed
Valuation	V ten years after period of operation
Other valuation	Not taken place V one year after completion
Type of valuation	Indicative

Number	158
Core description	Renting and hiring out
Process	Renting and hiring out materials and buildings or parts thereof
Actor	Support services
Basis	Turnover Tax Act, Section 34a; Care Institutions (Accreditation) Act (WTZi)
Information objects	Rental agreement; Information and approval from the Committee for the Restructuring of Hospitals; Permission; Giving in use; Taking in use; Lease
Valuation	V ten years after termination
Other valuation	<ul style="list-style-type: none"> • Information and approval from the Committee for the Restructuring of Hospitals V ten years after completion • Permission to use V one year after period of operation • Not taken place V one year after completion
Type of valuation	Indicative
Comments	See Section 1.6.3 of the introduction for more information on retention periods for financial documentation in relation to commercial real estate.
Number	159
Core description	Decommissioning buildings and grounds
Process	Taking buildings and grounds out of use
Actor	Institutional management
Basis	WHW Section 2.13; Care Institutions (Accreditation) Act (WTZi)
Information objects	Decision on decommissioning; Notification to minister; Report from minister on non-use authority; Notification from Committee for the Restructuring of Hospitals
Valuation	V five years after use
Type of valuation	Indicative
Comments	This concerns an obligation to report any decommissioning to the Ministry of Education, Culture and Science; the minimum retention period is derived from this. For the retention of documents relating to the special character of a building (such as the date of demolition or disposal), see Section 1.6.3 of the Introduction and Section 3.6.1 .
Number	160
Core description	Demolition
Process	Demolishing buildings and grounds
Actor	Institutional management
Basis	Environmental Permitting (General Provisions) Act, Section 2.4
Information objects	Demolition plan; Environmental report; Disposal document; Demolition permit
Valuation	V ten years after completion
Other valuation	<ul style="list-style-type: none"> • Environmental report; Disposal document (hazardous substances); Presence of hazardous substances V thirty years after completion • Not taken place V five years after completion
Type of valuation	Indicative
Comments	It is recommended that environmental reports/impact assessments and disposal documents be retained for up to thirty years after the demolition of the building in question, because of possible information about harmful substances. For the retention of documents relating to the special character of a building, see Section 1.6.3 of the Introduction and Section 3.6.1 . The demolition decision could be kept here permanently, for example.

2.6.8 Protection of personal data

The General Data Protection Regulation states that organisations should take measures to ensure that personal data are adequately protected.

Number	161
Core description	Policy on personal data and information security
Process	Drawing up policy for the protection of personal data and information security
Actor	Institutional management
Basis	General Data Protection Regulation; Government Information Security Baseline
Information objects	Policy; Decision; Recommendations from Protection of Privacy Committee; Evaluation; Privacy Impact Assessment; GDPR processing register
Valuation	Retention (SA-B3)
Other valuation	Not taken place V one year
Type of valuation	Indicative
Comments	This also includes policy on the use and management of data about alumni. For the GDPR processing register, see Appendix 1 . GDPR processing register is dynamic. It is a register that is liable to change. The obligation for retaining the processing register concerns the register itself, with checks being possible to see what changes have been made to the register over time. It is advised that the register be retained every five years.
Number	162
Core description	Data breaches
Process	Dealing with data breaches
Actor	Institutional management
Basis	General Data Protection Regulation; Policy rules on reporting data breaches
Information objects	Data breach; Notification to Dutch Data Protection Authority (AP); Response from AP; Informing the parties affected
Valuation	V five years after completion
Type of valuation	Indicative
Comments	The retention period relates to the period of three years within which an affected party may hold the institution liable for the consequences of a data breach. Even a suspicion of a data breach (but which is not ultimately reported) and the investigation into it must be retained for a longer period of time, which is why there is no 'Other valuation' here.
Number	163
Core description	Personal data rights
Process	Dealing with claims based on the right to have personal data processed (or not).
Actor	Institutional management
Basis	General Data Protection Regulation
Information objects	Viewing, correction, deletion, restrictions on processing or data portability requests; Objection to processing; Decision; Permission to process personal data
Valuation	V five years after completion
Other valuation	<ul style="list-style-type: none"> • Permission to process or use V five years after period of operation • Viewing request V one year after completion • Not taken place V one year after completion
Type of valuation	Indicative
Comments	For processing medical data, see process 80 .

Processing personal data (as part of alumni management, for example) is only permitted by the GDPR if there are compelling reasons for doing so. See [Section 3.7.3](#). This section also explains how personal data should be dealt with where permission for retention has been withdrawn by the relevant party.

III. Explanatory notes and justification

The explanatory notes and justification that follow give the reasons for the most important choices made by the editors and the areas of concern when determining the retention periods in the Universities and University Medical Centres Selection List. There is also a focus on the management of archives in a broader sense.

3.1 Objectives and users

A selection list is used when archiving information objects. This used to be done when archiving and selecting files, in other words, from the 'back end' of the process. However, retention periods are being used increasingly frequently when setting up information systems and processes. The selection list is intended primarily to designate retention periods to information objects and to plan the information management strategy accordingly. The possible additional applications are broader. The selection list is intended to be applied widely, and its structure has been designed with this in mind. Among the intended users are:

- documentation archivists, information managers, record managers, and archivists, for selecting documents and files and for setting up a retention strategy for organisations as a whole;
- information managers and information architects for estimating the quantity of process-related information that is 'under control' in the university;
- functional managers, for setting up automated retention regulations in applications;
- company lawyers, for assessing the degree of legal compliance of the organisation, as regards archive management;
- quality employees and auditors, for assessing the quality of the information management and for issuing informed recommendations;
- administrative staff, for determining the retention period and areas of concern for the files they create.

3.2 Use of the terms 'archive' and 'processes'

Selection lists are drawn up to enable the organisation in question to determine the retention periods and strategies for information objects. The background to selection lists is the Public Records Act 1995, from which the definition of 'archive' for this selection list comes. An organisation's archives (in this case universities and UMCs) are the information generated from the duties and processes that officially come under the organisation's responsibility, and which therefore serve as proof that the processes have taken place. The form such information takes does not matter here – information objects are data that can be recorded on paper documents, stored in archive boxes or files, on digital files on shared drives, or as records in a database. It is the function that is of primary importance – the information objects are the archive items of the processes and demonstrate that they have taken place. The information objects provide information about the processes that have been carried out and are necessary for establishing the rights and obligations of the parties involved.

The term 'processes' is used, rather than 'actions' (which is usual with the setting up of selection lists based on the 'Project Implementation Reduction of Transfer Period' method (known as 'PIVOT' in Dutch)). The term 'processes' corresponds to the language used in organisations and certain related fields such as administrative organisation and information management. Attempts have been made when drawing up this selection list to describe the categories of information objects at as high a process level as possible, rather than making a distinction at the lower task level – with some necessary exceptions, such as processes carried out by the examinations board.

3.3 Permanent retention

The purpose of valuating, selecting, and acquiring public records is to bring together and secure sources that enable individuals, organisations, and social groups to discover their history and to reconstruct the past of state and society, and how they interact. To that end, the public records (or parts thereof) being secured should be:

- a. representative of what aspects of society have been recorded;
- b. representative of the activities of members (people and organisations) of a society;
- c. regarded by observers as important, special, or unique, because they reflect important, special, or unique social developments, activities, people, or organisations at a particular time¹⁴.

Universities and UMCs are an important part of Dutch society. Their archives fulfil an essential social need. This means the functions these institutions serve are of importance for future scientific and historic research. It is proposed that the processes relating to the development, evaluation, or adjustment of policy outlines be retained permanently, in line with the general selection criteria. Processes that give an image of the institution and which are regarded as 'special' are also retained permanently.

The obligation to retain or destroy information objects is embedded in the tasks that universities or university medical centres, as government bodies, carry out, and are therefore subject to the provisions of the Public Records Act 1995. Information objects of universities and UMCs that operate as government institutions under the terms of the Public Records Act 1995 (Bulletin of Acts and Decrees 1995, 276) must be transferred after twenty years to a retention facility at a Regional History Centre (RHC). The archive retention facility for the province of South Holland is the National Archives. In the case of special universities and UMCs, this applies only to information objects that must be retained permanently, of processes that result from a public authority function. Among the options for all other special university or UMC information that has to be retained permanently are donating them to or depositing them at a national public records location. These institutions may also make their own permanent retention arrangements.

The same applies to the transfer of digital files to an e-depot. Private/special institutions may elect to create their own e-depot, while public institutions must transfer them to the RHC e-depot. The necessary measures, including an e-depot, for digital and digitised information objects must be taken for this purpose. A useful guide is the 2012 *ED₃; Eisen duurzaam digitaal depot (versie 2)* publication, drawn up by the National consultation committee of provincial archives inspectors (LOPAI).¹⁵ It is also a good idea to keep up to date with all relevant national and international developments in this area.

3.4 Explanatory notes for retention periods and compiling of files for teaching and assessments

As well as a patient care, valorisation, and scientific research, the most important processes for universities and UMCs are aimed at teaching students and issuing documentary evidence demonstrating that students' capabilities in their field have been tested. These sections give more detailed substantiation for the retention periods for assessment and testing.

3.4.1 Retention period for examinations and final projects

The Higher Education Quality Assurance Reinforcement Act states that "final assignments (or visual material of same) that have been successfully completed must be retained for at least seven years by the institution. This therefore concerns theses, final research projects, and reviews of students' academic records. To reduce administrative burdens, examinations taken and essays produced

¹⁴ Letter to the House of Representatives from the Ministry of Education, Culture, and Science and the Ministry of the Interior and Kingdom Relations regarding the strategy for selecting public records, 17 December 2010.

¹⁵ This publication is freely available on the internet (in Dutch).

during the degree programme are not subject to this retention obligation.” No clear-cut retention period is prescribed by the WHW for examinations or the assessments of non-final examinations. However, a number of requirements in the act and day-to-day practice in the institutions give a maximum and minimum period. The periods ultimately selected are those given under ‘periods selected’.

The Universities of Applied Sciences selection list has a minimum period of two years for accounting for the work of universities of applied sciences through representative selection, and a minimum period that runs up to the end of the period of objection for accounting for a student’s work and the assessment thereof. This section describes the considerations for the *maximum, minimum, and the retention period ultimately selected* for accounting for a student’s work and the assessment thereof. The universities and UMCs have elected to adopt these periods (see ‘periods selected’).

Maximum period

The maximum period describes the maximum period of time during which examinations and final projects may be retained.

According to Section 7.10 of the WHW, an examination involves “testing the knowledge, understanding and skills of the examinee and an assessment of the results of this test.” When accounting for the research carried out for an examination, a representation of the examination work is required.

The *maximum* conceivable retention period of ten years after termination of enrolment of an individual student is related to a number of considerations and depends mostly on the periods of time for exemptions. The principle is that when a student’s academic record is reviewed, the examinations board must be in a position to account for the examinations. This does not mean that the student’s whole file can be viewed by the examinations board on the spot, but that it is in a position to hold further investigations (Section 7.10 and 7.12 of the WHW). The components of the student’s academic review (examinations) are assessed by the examiners. The examiners must in turn be able to account for their assessments when reviewing students’ academic records (Section 7.12c, paragraph 2, WHW).

Universities and UMCs operate a randomly assumed maximum period of ten years for exemptions based on previously acquired diplomas, modular certificates, or statements of successfully completed examinations (Section 7.11, paragraph 5, WHW). It should be stated here that the burden of proof will often lie with the student and not the previous education institution. If a student’s enrolment has been terminated, the institution granting exemptions for a follow-up programme must be in a position to account for any such exemption (Section 7.12b paragraph 1 under d, WHW). This could mean in theory that the next institution must be in a position to validate exemptions based on examinations taken by the student in question at a previous university or university of applied sciences.

From the aforementioned considerations, the maximum conceivable retention period is ten years following termination of the student’s enrolment, including their product and the examiner’s assessment. This period would impose a disproportionate burden on universities and UMCs as a result. The maximum period has now been obviated by setting a ten-year period for the statements issued by institutions in accordance with Section 7.11 paragraph 5, WHW summarising the examinations successfully completed by students. These statements can then be certified using a copy from the archives. This file copy could also be a record in a database, if the associated rights may be derived from it; for this, compare the replacement of degree certificates by a register in Section [3.4.3](#).

Minimum period

The minimum period describes the minimum period of time during which examinations and final projects may be retained.

The process of confirming the assessments of examinations generally includes a period of six weeks during which objections may be lodged. The retention period for an examination product and its assessment could therefore be set at a *minimum* of six weeks without further consequences.

Final projects submitted in a physical form in particular (works of art and work assignments) represent a large burden for universities if they have to be retained for more than six weeks.

Periods used

The period used describes the retention period for which examinations and final projects may be retained.

The 'maximum period' and 'minimum period' sections give an interpretation of which minimum or maximum period should be applied. An interpretation other than the maximum or minimum period concerns that of setting the validity period of examinations. The examinations board may extend the validity of an examination if the institution has restricted said validity on the basis of knowledge that is now clearly outdated (Section 7.10 paragraph 4, WHW). When the examinations board expresses its view of a student's academic record or extends its validity, it should reasonably have the information objects at its disposal from which it is clear that the examiners have drawn up and assessed the examinations in a proper manner. The emphasis here lies on the proper development and conducting of the exam by the examiner.

By referring to the accreditation and the representative test by the Visitation and Assessment Body (VBI) or NVAO, it is possible for individual students' examinations to be destroyed once the period during which objections may be lodged has lapsed. A retention period of two months may be assumed, which includes an additional few weeks on top of the period of objections (six weeks, the minimum period), based on a risk assessment.

The retention period for the assignment part of the examinations is prompted by the necessary availability of these information objects when applying for an accreditation, once every six years (Section 5a.9, paragraph 7, WHW). Another year is added to this, in consideration of any risk. Information objects that serve as the basis for a representative selection should be retained for two years. Degree programmes should be able to provide any such selection during an accreditation. The retention period is based on the annual production of such a selection (to which one year has been added, as a precaution). The NVAO and the VBI may impose additional requirements on this retention period.

Risk

Institutions are increasingly frequently being called to account in relation to the knowledge (or lack thereof) that students are supposed to acquire during their studies. In particular, knowledge that is not tested during the reviews of their academic records or in final projects, but only in examinations, is causing problems of accountability for institutions. In such cases, the institutions could invoke the accreditation. However, this is risky, as the value of an accreditation is not clear in these cases. On the basis of this risk, examinations could be retained for longer. On the other hand, this requires more storage capacity and that entails additional costs. Institutions should therefore weigh up the storage costs against the risk of not being able to properly account for one of its degree programmes.

Final projects and their completed assessments should be retained for seven years, regardless of the form they take, in accordance with Section 7.3 paragraph 5 of the WHW (incl. explanatory memorandum).

If a university or UMC is able to centrally manage (in a student file or with the help of metadata) the examinations and assessments for each student through digitisation and the practical deployment of resources and regulations, then it will be possible to link the retention period to the date of the relevant student's termination of enrolment. This obviates the acceptable risk of having an incomplete file for students who study for longer than the set period if a university or UMC wishes to conduct a watertight risk policy.

3.4.2 Compiling of files for examinations

When compiling files for examinations, a key role is that of accounting for the assessments by the examiners. This accountability is achieved by compiling reliable files after the examination and

assessment of the products. The following information objects are included with the relevant process:

- the examination protocol of the examination in question;
- the answers to the questions or assignments;
- the cut-off score for the assessments;
- the student attendance list, if applicable;
- the actual examination or assignment;
- students' products (or representations thereof);
- the assessments of the products;
- the second assessments of the products;
- the evaluation of the development and the conducting of the examination.
- The list of examiners

Compiling integrated files for examinations can impose considerable burdens on the facility resources of an institution, or even be impossible. This is the case, for example, when examinations are held in large numbers, or whose products have sizeable dimensions (with engineering degree programmes, for example), or which are transitory in nature. It is important to realise here that, as well as the description of the product, the accountability of the assessment is the most important archive item. A piece of music can be recorded, and photos be taken of a physical model. These are representations and therefore smaller versions of the actual work. It is possible that other products cannot even be recorded. The most essential thing when compiling files is that the assessments (completed forms or otherwise) are properly recorded and retained; this way, the examiner will be in a position to account for their individual assessment, for as long as it is necessary to do so. If the assessment of the examination product has been attached to the product itself, such as physical comments and the mark on the written version, then the product and the assessment should be regarded as one entity.

3.4.3 Examinations and degree certificates

Degrees and degree certificates are valid throughout the lifetime of the holder. Graduates must be able to refer to them during their careers, or when embarking on a subsequent course of study. Universities may be requested to issue certified copies of certificates and supplements for these purposes. For this reason, the retention period for the issuing of degrees, certificates, and supplements in this selection list is fifty years after the review of the academic record of the student in question (this used to be thirty years). Institutions may elect to replace copies of certificates and degree certificates with a graduate register to be used for maintaining and providing information about the degrees they have issued. The records in this register will then become the information objects. Having such a register would markedly reduce the amount of physical or digital space needed for storing certificates.

The administration of certificates and degree certificates may be done digitally. It would not be necessary to retain physical copies of certificates or degree certificates in that case. If this information is stored in a digital system, it is strongly advised that it complies with standard NEN2082. This standard prescribes, among other things, that systems must be adequately protected against modifications, and that any changes made are stored in an audit trail. For drawing up procedures for storing such data, please refer to NEN-ISO 15489-1. This standard sets the requirements of the procedures used in proper record management. The storage of data about certificates, degree certificates and lists of marks must be properly safeguarded, in order that their authenticity and preservation can be guaranteed.

For information objects from the first phase (assessment), a different retention period may apply to that for information objects from the second phase (issuing degree and degree certificate). The Higher Education Quality Assurance Reinforcement Act sets the retention period for the reviews of students' academic records and related essays at seven years (Section I under O). Although the remaining provisions in this proposal have not been adopted, this period does apply to the processes in question. The reason for this lies in the Letter to the House of Representatives from

the Minister of OCW of 5 February 2013, in which she stated her intention to make administrative agreements about the seven-year retention period (among other things), given the delay in the legislative proposal.

3.4.4 Longer retention of final projects

Like research carried out by the institution itself, theses and other final projects may be of value for future research. This depends partly on the quality of the work, to what extent it is a product of its time (see 'representative selection'), and the commissioning party, if any. The retention period for final projects in the selection list is set at a minimum of seven years, based on Section 7.3 paragraph 5 of the WHW (June 2014). Institutions may decide to link a more generous retention period to, say, the level of the mark for the final project.

If an institution retains a final project for longer, then it no longer serves as an archive item for the relevant process, but as a source for future research. Storing in databases on the internet is no guarantee for permanent digital storage.

For permanent storage of final projects, institutions should create their own digital repositories (see the comments about e-depots in [Section 3.3](#)) or use a repository service. The digital or digitised essays stored here may serve as file copies if the institution is able to demonstrate that their authenticity is guaranteed. In practice, file copies are likely to be stored elsewhere.

For essays other than theses, such as internship reports, works of art of exceptional value and contributions by students to applied research, extensions to the retention period may be made as well. This occurs in exceptional cases and, as may be expected, be at the initiative of the examiner. It is up to individual institutions to set their own rules for such long-term storage, where possible in consultation with fellow institutions.

3.5 Explanatory notes for retention periods for research, medical data, and valorisation

Research, and especially valorisation of that research, is becoming more and more important for universities and UMCs. This chapter looks at how the retention periods for the relevant processes have been arrived at.

3.5.1 Research

In the selection list, research has been divided across a number of processes that could otherwise be regarded as belonging to the same main process. What is important here is that research results are retained for future use (not as file copies, but as a source of knowledge – see the previous section) and the information objects of other processes are destroyed in a timely manner.

Raw research data

This refers to the data that substantiates the report in question. It does not therefore refer to the literature or data collected or used in preparing the research, but the data gathered during the research itself. Given the various forms of research that exist, it is not possible to have one single destruction deadline. A decision has to be made on every research project as to what data should be retained for a particular period. The nature of the data should be considered in this regard.

Source data are usually created in a work process, from which a retention period can be determined. However, data can be reused, especially in research projects. Reused data must be retained for as long as it has value. Reuse always takes place in the future which makes setting a retention period for source data difficult, because it is not easy to know whether any future use of the source data will actually take place.

Medical data should in some cases be retained for twenty years, while market research produces data that are no longer needed after the drawing up of the report. There are also research projects in which so much data is processed that it is not feasible and is very costly to retain it for a long time. Account should also be taken of research projects that could possibly be susceptible to fraud.

The Netherlands Code of Conduct for Research Integrity provides guidelines on retaining research data¹⁶, but no specific retention periods.

This selection list therefore advises the inclusion of an article in every project plan stating how long underlying data should be retained. Account should be taken of the nature of the data, its value, personal data, and storage method. The reusability (that is, its value) of the data should also be tested in relation to the social need for its retention, such as open science. There are various open science initiatives that researchers can take part in, to that end. If a project plan has no retention period, then it should be determined retrospectively in consultation with all relevant parties. Therefore, the selection list does not mention any specific retention period for raw research data.

If data is retained, the algorithms on which such data is based should be kept too. Algorithms used for analysing data should also be kept with the data. This means that the documentation relating to these algorithms and the connections between the algorithms and the data should be retained as well. These algorithms (including documentation) should have the same retention period as the data they created or used.

Funding research

Multiple actions or processes are carried out in any research project. Each of these processes has its own retention period on the selection list. Applications for a licence, for example, come under [process 133 Licences](#). The accounting records of a research project are covered by [process 134 Accounting records](#). Research projects in enterprises are dealt with by [process 135 Accounting records of enterprise](#). In these cases, a general retention period of seven years can be applied. Part of the accounting records may be needed for the accounting for grants that have been obtained (processes [142](#) and [143](#)). A generic retention period is used for these processes, but given that grant regulations have their own accountability period and therefore their own retention period, it may be that the retention periods for the accounting records of specific research projects depend on the periods specified in these regulations.

3.5.2 Medical data

With the amendment to the Medical Treatment Contracts Act (WGBO) in 2019, the retention period for patient medical data in the Dutch Civil Code 7, Section 454 was raised from fifteen to twenty years after last treatment or death or for as long after the expiry of this period as is reasonably necessary to provide the standard of care of a prudent care provider. This is included in [process 80](#).

The UMCs have elected to keep a number of information objects 115 years after birth. They regard this as important for possible treatment of future conditions. They state that this is very much in the interest of patients. Patients and ex-patients can always invoke the General Data Protection Regulation to request that their file be deleted or destroyed.

Clinical trials

Clinical trials that involve patients are carried out in teaching hospitals, universities, and university medical centres. It is assumed in this selection list that medical data that can be traced to specific patients are included in the patient files. As discussed in the foregoing paragraph, these data should be retained for twenty years. This does not automatically mean that clinical data that are used or collected during the research have to be kept for twenty years. For the retention periods for research projects, this selection list refers to [process 72](#) (V ten years after completion). As explained in [Section 3.5.1](#), the type of research and the use of research data (raw or otherwise) may make it necessary for a different retention period to be chosen.

Teaching hospitals, university medical centres, and universities can therefore always deviate from the ten-year period and opt for a retention period of twenty years, for example. However, this

¹⁶ Whereas the Netherlands Code of Conduct for Academic Practice (2014) mentioned a retention period of ten years for research data, its successor, the Netherlands Code of Conduct for Research Integrity (2018), is silent on the matter.

should not depend on the patient data being used (which comes under [process 80](#), after all), but on the value of the data that has been collected.

Organ donation and artificial insemination data

In the case of organ donation, oral and written information about the nature and purpose of the removal of the organ and the expected consequences and health risks and other living conditions are subject to a retention period of 115 years after the birth of the party involved. This applies to the statement granting permission to remove a particular organ. The period of 115 years is based on the duration provided for in law 'or for as long after the expiry of this period as is reasonably necessary to provide the standard of care of a prudent care provider'. After all, some medical data could affect the patient's future medical treatment during their lifetime and should therefore be kept for a long time. For data on organ donations, there is a statutory retention period of thirty years post-treatment, in accordance with Directive 2010/45/EU (Article 10 paragraph 3b) regarding the quality and safety standards for human organs intended for transplant purposes.

The thirty-year retention period for donor data in relation to artificial insemination applies if the data have been transferred to the Artificial Insemination Donor Data Foundation (SDKB). If they have not, then the eighty-year retention period stipulated by the Artificial Insemination (Donor Information) Act applies. This Act entered into force on 1 June 2004. For data originating before that date, the retention period is eighty years. Institutions do have the option of transferring this data to the SDKB after all.

3.6 Other explanatory notes to specific processes and information objects

This section contains other explanatory notes for processes not mentioned under the comments section on the list itself.

3.6.1 Accommodation

The retention period lists for universities of applied sciences looked at, contain categories in which the use and design of buildings were designated for permanent retention. The working group has decided to depart from this. The only process in this category that is given a permanent-retention valuation is that of the development of accommodation plans, given that they convey strategic information about the housing of institutions and degree programmes.

The choices are based on the fact that the management of buildings is not the most important task of an institution. The historically relevant documentation relating to the construction and design of buildings can already be found in municipal archives, so it is not necessary for institutions to keep these information objects as well. That is why a retention period of ten years post-use (that is, after demolition or disposal of the building) applies.

However, information objects with a special value may be retained, in accordance with Point 6 in Section [1.6.3](#) of the introduction. If an institution building is regarded as noteworthy, it is a good idea to keep documents relating to construction reports, design, realisation, specifications, and demolition/disposal decisions.

3.6.2 Meetings

The selection list contains three processes for meetings:

- [17 Strategic consultations](#); periodic meetings at strategic level
- [18 Tactical consultations](#); periodic meetings at tactical level
- [19 Operational consultations](#); meetings at operational level

Only process 17 is to be considered for permanent retention. This includes the meetings of the institutional management and the Supervisory Board. The same applies to meetings with the

minister or the ministry. Process 17 concerns the meetings in which decisions are taken about the policies on the performance of the institutions' tasks.

Process 18 is intended for meetings at tactical level. These are committee and working group meetings in which no decisions are taken on policy-related matters. It also includes meetings with third parties, where the secretarial duties are carried out by the institution. If the institution carries out the secretarial duties of a meeting dealing with strategic matters, it comes under process 17 (retain).

If the institution takes part in a meeting organised by a third party, the meeting comes under process 19.

Process 19, Operational consultations, is intended for consultative meetings and those related to day-to-day affairs.

Meetings of independent committees come under process 17 if they take policy-related decisions ([see Section 3.6.4](#)). If this is not the case, such as with the examinations board or the programme committee, the meetings come under process 18.

Meetings dealing with one topic often form part of a specific process. The decisions and reports of these meetings come under the process that the meeting itself comes under.

Meetings of a particular body that normally come under process 18 or 19, may be retained permanently, in accordance with [Section 1.6.3](#), with a view to their historic significance.

Meetings with companies that fund research are valued according to the subject under discussion. If they involve the partnership itself, it comes under process 17, 'Strategic consultations'. If they involve the funding or the carrying out of a research project, it comes under process 18, 'Tactical consultations'.

Appendices

It is advised that only the appendices relating to board-level meetings (Executive Board and Supervisory Board) be retained. For other meetings, the advice is to destroy appendices, given that any value in keeping them is very slight. Exceptions may be made if there are good reasons for doing so.

3.6.3 Participation in decision-making

The definition of a representative advisory body also extends to works councils. The actual term used depends on the institution in question.

A representative advisory council is an independent body that should manage its own archives. Representative advisory councils have no legal personality, so the management of their archives comes under the administrative responsibility of the institution, which is why process 17 applies here.

Decisions by the representative advisory councils that are sent to the institution come under the process carried out by the institution. Responses from or recommendations by a representative advisory body are therefore subject to the retention period of the process that covers these information objects. Meetings between a representative advisory council and the institution should also be retained because the representative advisory councils also issue recommendations on matters eligible for permanent retention.

3.6.4 Committees, working groups, and steering committees

There are many different committees, working groups, and steering committees in any institution. This selection list contains only one process for every committee, working group, and steering committee: [process 113](#).

It states that the information objects of most committees should be destroyed. Only information objects of committees that could be regarded as an independent body should be retained, according to this process. This refers in particular to programme committees, examinations boards,

medical and scientific advisory committees, notification committees, advisory committees on objections relating to legal status, and complaints committees. Other committees are not regarded as independent bodies, and the information objects they produce may be destroyed five years after their disbandment. Unlike the independent bodies, these ad hoc committees are set up to deal with one issue or project, and are therefore temporary. The independent committees are set up specifically to carry out one task that is obligatory for education institutions.

Appointments may be destroyed seven years after the end of the appointment in question.

Whether someone was a member of a committee, steering committee, or working group can be inferred from the names on the minutes of the meetings. The seven-year period is due to the fact that the members often receive a fee, which means there is a financial component.

3.6.5 Quality assurance

Quality assurance is a collective term for a number of processes at universities and UMCs. In some cases, it is regarded as a process in itself. It might therefore be expected that a quality assurance process described in this list contains every task relating to quality assurance. However, quality assurance appears in a number of processes on the selection list indirectly. The only process in which quality assurance is mentioned explicitly is that of setting up the quality assurance system, [process 23](#). This concerns the setting and safeguarding of the quality assurance duties in a Quality policy memorandum and the adoption of the memorandum. The actual quality assurance features in processes for audits, satisfaction surveys, accreditation, validation, and elsewhere.

3.6.6 Internal internships

When the occasion arises, work at the institutions is carried out by interns. In the case of internal internships, a distinction should be made between the personnel documents that go with these internships and those that form part of research or study. Separate retention periods are used for these information objects. There are no objections against information objects relating to the study ending up in a personnel file, as long as they are copies that are destroyed before the review of the student's academic record. Internship agreements are concluded for interns from degree programmes from other institutions. They can be treated in the same way as internship agreements relating to students from the institution on internships at an external organisation.

3.6.7 Financial documentation

Section [1.6.3](#) of the introduction describes the statutory provisions for various retention periods of financial documentation. This section also makes a suggestion for the creation of various series for information objects that relate to commercial real estate, and information objects where this is not the case. A selection has already been made for a number of processes on the selection list. When digitising financial documents (usually scanning invoices) or processing born-digital financial documents, costs can be saved by including metadata of the files, stating whether there is a relationship with commercial real estate. By setting the retention periods in management applications on this basis, much disk space can be saved in the digital environment: the financial digital documents not marked 'real estate' can be destroyed seven years after the adoption of the annual statement of accounts.

3.6.8 Providing information and making announcements

Various processes involve the provision of information to students, patients, citizens, the minister, and third parties. In principle, the provision of information or the making of announcements have the retention period of the process that the information or announcements concern. This means that the provision of information to the minister does not automatically have to be retained permanently. It depends on the purpose of the information and the retention period of the process that the information concerns.

Because some announcements are made and some information is provided as separate work processes, a generic process has been included for both:

[process 148](#) for announcements and [process 149](#) for information. Specific retention periods have been included for providing information in a number of processes. For example, there is a separate work process for information to students and prospective students, [process 51](#), because students are able to derive rights contained in the information for a long time.

Also, [process 72](#) (research projects) and [process 80](#) (patient medical data) contain specific retention periods for providing information about data, because of statutory obligations.

3.6.9 Collaboration

An institution can work in partnership with other parties or institutions in a range of areas. Agreements have been included as information objects in a number of specific processes. For a number of agreements, a generic process has been included, or a decision has been taken to include a specific process. Such choices depend on the recognisability of the agreement and any differences in the retention periods.

[Process 121](#) concerns a generic process that covers every agreement. Specific processes have been included for a number of specific agreements.

Teaching

[Process 9](#) concerns partnership agreements that lead to joint regulations or to collaboration between government-funded institutions. This could therefore also include collaboration with a foreign partner.

[Process 43](#) concerns collaboration between institutions for providing teaching, to the extent that it does not lead to a formal partnership. These usually involve collaboration in the area of one degree programme or subject specialisation, while formal partnerships relate more to a whole field of study.

[Process 50](#) concerns agreements with individual students and, if applicable, their employers, who wish to take a work-study degree programme.

Research

There are various types of collaboration in the field of research.

A chair ([process 67](#)) may be set up in collaboration with a third party, for example. This is mostly the case with endowed and special chairs.

[Process 68](#) is specifically intended for research-based collaboration. Research is often carried out in partnership with companies or institutions. The agreements drawn up for this purpose come under this process.

Such an agreement may lead to the setting up of a separate research school or research institute. This is the purpose of [process 69](#).

If a product is developed during a research project that undergoes subsequent development and may be exploited commercially, a company may be founded. This is the purpose of [process 74](#).

Patient care

Collaboration in the field of patient care mostly involves collaboration between institutions. This comes under [process 9](#).

3.7 Registers and legislation

3.7.1 Registers

A number of registers are kept, for reasons of legality and regularity. These registers may have a retention period. [Appendix 1](#) gives an overview of the registers whose retention periods are known.

3.7.2 Legislation

[Appendix 2](#) gives an overview of all the known retention periods prescribed by law. Universities and university medical centres should take account of the fact that statutory retention periods may be amended or introduced even after the adoption of the selection list. If universities and UMCs notice, after the adoption of the selection list, that processes are missing, the valuation for said processes must take account of statutory retention periods. Even after the adoption of the selection list, it is possible that retention periods in this legislation are amended. In such cases, the institutions must adhere to the amended statutory retention periods.

3.7.3 General Data Protection Regulation

The General Data Protection Regulation (GDPR) entered into force on 25 May 2018 and replaced the Personal Data Protection Act (WBP). The GDPR attaches conditions to the retention of personal data. Basically, personal data may only be retained if an organisation has well-founded reasons for doing so. The GDPR has six bases for processing personal data:

- a) Permission: The data subject has given their permission (for example, on the internet form giving their consent to their data being processed).
- b) Agreement: The processing is necessary for the implementation of an agreement to which the data subject involved is party.
- c) Legal basis: Legislation requires that the personal data of a data subject be processed. A work process inventory could state the legal basis on which each work process is based.
- d) Public interest: The data processing is necessary because of a designated task carried out in the public interest.
- e) Vital interest: The data processing is necessary to prevent or mitigate a serious threat to the life or health of the data subject.
- f) Legitimate interest: collecting personal data is more important than the right to privacy of the data subject. This point does not apply to government bodies. They may not invoke any right to processing based on their own interests. It should always be based on a task in the public interest.

The GDPR applies as soon as personal data have been added to files due to be archived. Processing for archiving purposes is regarded by the GDPR as compatible with the original processing. This is therefore always permitted, even if the archiving purpose was not originally stated to the data subjects. In addition, the archivist does not have to inform the data subject about the processing, as this would create a disproportionately heavy burden. The GDPR contains other exceptions regarding archiving.

For example, personal data may not be retained for longer than necessary, but longer storage is permitted for archiving in the public interest. However, in such cases, the data subject could invoke their right to have their data deleted. This right is contained in Article 17 of the GDPR. In such cases, the government would be obliged to delete the personal data without any unreasonable delay. This is not ideal for archives, as it would affect their integrity.

The European Parliament and the Council recognised this problem at an early stage. For this reason, the right to delete data is declared non-applicable in cases where it is likely to render impossible or seriously impair the achievement of the objectives of that processing with a view to the public interest, scientific or historical research, or statistical purposes (Article 17 under d of the GDPR).

This exception applies only where appropriate safeguards are included in the archiving process for protecting the data subject (Article 89 of the GDPR). For archiving purposes, public-sector organisations must therefore take the necessary technical and organisational measures in order to guarantee the principle of data minimisation. Where possible, this could be done by pseudonymising personal data in the archives.

Finally, the right to view and rectify data and that of data portability do not apply if data are to be, or have been, transferred to the National Archives or other archive storage facility. If the data subject believes that the transferred data are incorrect, they have the right, in accordance with the

GDPR Implementation Act, to add their own interpretation of the relevant information objects (proposed in Article 43 paragraph 3 of the GDPR Implementation Act).¹⁷

The Information and Heritage Inspectorate gives an explanation about the above at <https://www.inspectie-oe.nl/onderwerpen/avg-en-de-archiefwet> (in Dutch).

Unlike the WBP, the GDPR does not specify retention periods. In processes where personal data appear, the retention periods have been set with the GDPR in mind. Institutions should ask themselves whether specific personal data should necessarily be retained for as long as the information objects of the process as a whole.

By way of example, reference is made here to the identity documents of students who live in the EU. Once the identity of a student has been established, an institution no longer has any reason to retain it. The same applies to determining the identity of a patient. In other words, as soon as the student has been enrolled, the requested copy of their identity document should be destroyed. Therefore, it is not mentioned as an information object with enrolment on this selection list; it is assumed that the institution in question would not keep it.

Retention of anonymised data is permitted, however. Provided the personal data cannot be traced to an identifiable natural person, data may be retained for a longer period for (historical) research purposes, for example.

Finally, there is the matter of destroying personal data that has been retained with the permission of the data subject, but who subsequently revokes that permission. This is the case, for example, with completed survey questionnaires where participants state at a later stage that they do not wish their data to be kept. Here, the permission to process the personal data is revoked by the data subject and it should be destroyed. The questionnaire may be retained in an anonymised form. This provision applies only when the permission of the data subject is the only basis for processing.

For personal data that is retained on another GDPR basis, the normal retention period for the matter of which the personal data form part applies.

3.8 Abbreviations

ABP: General Pension Fund for Public Employees
AIOS: Research assistant training to specialist level
AP: Dutch Data Protection Authority
APL: prior learning/accreditation of prior learning
ASW: Acquisition, Selection, and Valuation working group
Awb: General Administrative Law Act
BIG: Individual Healthcare Professions Act
BRON: Key Registration for Education
BRP: Key Register of Persons
BSA: binding study advice
BSD: Basic Selection Document
BWNNU: Non-Statutory Unemployment Regulation of the Dutch Universities
BWRHBO: Non-Statutory Unemployment Regulation of the Dutch Universities of Applied Sciences
CAO: Collective Labour Agreement
CBAP: Central Applications and Placement Office
CBE: Examinations Appeals Board
CBHO: Higher Education Appeals Board
CBS: Statistics Netherlands
CCMS: Central College of Medical Specialisms

¹⁷ Source: <https://ictrecht.nl/2017/12/07/archiefwet-versus-het-recht-om-vergeten-te-worden/>

Universities and University Medical Centres 2020 Selection List

CDHO: Higher Education Efficiency Committee
CROHO: Central Register of Higher Education Programmes
DUO: Education Executive Agency
EEA: European Economic Area
ESF: European Social Fund
FOS: financial support for students
GDPR: General Data Protection Regulation
HBO: higher professional education
HOAK: *Higher Education: Autonomy and Quality (Hoger onderwijs: autonomie en kwaliteit)* memorandum (1985)
IND: Immigration and Naturalisation Service
KNMG: Royal Dutch Medical Association
LOPAI: National consultation committee of provincial archives inspectors (*Landelijk overleg van provinciale archiefinspecteurs*)
MDT: macro-efficiency check
MR: representative advisory council
MTO: Employee satisfaction survey
NVAO: Accreditation Organisation of the Netherlands and Flanders
NWO: Dutch Research Council
OCW: Ministry of Education, Culture and Science
OER: Teaching and Examination Regulations
PA: Pathological/Anatomical
PIVOT: Project Implementation Reduction of Transfer Period
RGS: Commission for the Registration of Nursing Specialisms
RIO: institutional research report
SEP: Standard Evaluation Protocol
SIA: Innovation Alliance Foundation (*Stichting Innovatie Alliantie*)
SZW: Ministry of Social Affairs and Employment
TNO: new degree programme assessment
UMC: University Medical Centre
UPIR: University Platform for Information service provision and Record management
VBI: Visitation and Assessment Body
VKO: Quality assurance for research validation committee
WBMV: Special Medical Procedures Act
WBOPZ: Psychiatric Hospitals (Compulsory Admissions) Act
WBP: Personal Data Protection Act
WEB: Adult and Vocational Education Act
WGBO: Medical Treatment Contracts Act
WHW: Higher Education and Research Act
WIA: Work and Income (Capacity to Work) Act
WKKGZ: Healthcare Quality, Complaints and Disputes Act
WMCZ: Participation (Clients of Care Institutions) Act
WMG: Health Care (Market Regulation) Act
WOB: Government Information (Public Access) Act
WOR: Works Councils Act
WTZi: Care Institutions (Accreditation) Act

Appendix 1 Registers

This appendix lists registers that institutions are obliged to keep up to date. The retention periods for the information in the registers are also mentioned.

Register of Diplomas	Process 61	Retain
Register of Doctorates	Process 63	Retain
Medical research proposals register	Process 71	Retain
Quality of healthcare register (including medical incidents)	Process 81	V twenty years after last treatment or death or for as long after the expiry of this period as is reasonably necessary to provide the standard of care of a prudent care provider
Infections register	Process 81	Retain
Use of medicine register	Process 81	V five years after completion
Occupational health and safety incidents	Process 105	V ten years after completion. If hazardous substances were involved: Forty years after completion: If exposure to radiation was involved: V thirty years after completion or 75 years after birth
Register of contacts with hazardous substances	Process 132	V forty years after completion
GDPR processing register	Process 161	Retain

Appendix 2. Retention periods in legislation (medical legislation)

[Radiation Protection \(Basic Safety Standards\) Decree](#)
[Dutch Civil Code, Book 2](#)
[Dutch Civil Code, Book 3](#)
[Dutch Civil Code, Book 7](#)
[State Taxes Act](#)
[Turnover Tax Act 1968](#)
[Public Procurement Act 2012](#)
[General Administrative Law Act](#)
[Working Conditions Decree](#)
[Working Hours Decree](#)
[Retention period for logging medical data](#)
[Nagoya Protocol](#)
[Implementing Regulations to the Wages and Salaries Tax Act 2011](#)
[Aliens Decree 2000](#)
[Higher Education and Research Act](#)
[Experiments on Animals Act](#)
[Termination of Pregnancy Act](#)
[Directive 2010/45/EU on the standards of quality and safety of human organs intended for transplantation](#)
[Body Material Requirements Decree 2006](#)
[Artificial Insemination \(Donor Information\) Act](#)

Radiation Protection (Basic Safety Standards) Decree

Article 7.16

1 The employer shall ensure that for every employee who is exposed the following is individually registered:

- a. surname, first name, date of birth, nationality, and gender;
- b. details concerning the employment of the employee;
- c. category A or B employee designation;
- d. the results of individual monitoring, determined in accordance with Articles 7.12, 7.13, 7.14, and 7.31, including the start and end date (if available) of the individual monitoring;
- e. the results of the zone monitoring, referred to in Article 7.13, second paragraph, used for determining the effective or equivalent doses;
- f. in the case of the exposures referred to in Articles 7.14 and 7.31, reports in relation to the circumstances and measures taken.

2 The employer shall ensure that the information referred to in the first paragraph, is in any case retained until the person to whom said information refers has reached the age of 75, or would have done so, but for at least thirty years after said person had ended their activities.

Dutch Civil Code, Book 2

Section 10

1. The board is obliged to keep records of the financial position of the legal person and of everything concerning the legal person's activities, in accordance with the requirements arising

from these activities, and to keep the books, documents and other data carriers in such a way that the legal person's rights and obligations can be known from them at any time.

2. Without prejudice to the provisions of the following titles, the board must, within six months of the end of each financial year, draw up and put on paper the balance sheet and a statement of income and expenditure of the legal person.

3. The board is obliged to store the books, documents and other data carriers meant in paragraph 1 and 2 for a period of seven years.

Dutch Civil Code, Book 3

Section 310

(...)

2. If the damage is caused by contamination of the air, water, or soil, as a result of the manifestation of a hazard referred to in Section 175 of Book 6 or of a movement of the soil as meant in Section 177, first paragraph, under b, of Book 6, then any legal claims for compensation for damage shall become time-barred, in derogation of the provision at the conclusion of paragraph 1, in any case after a period of thirty years has elapsed after the event that caused the damage.

(...)

Dutch Civil Code, Book 7

Section 454

3. Without prejudice to the provisions of Section 455, the care provider shall keep the documents referred to in the preceding paragraphs for twenty years from the date on which they were most recently amended, or for as long after the expiry of this period as is reasonably necessary to provide the standard of care of a prudent care provider.

(.....)

State Taxes Act

Section 52

1. Parties with administration obligations must keep records of their financial position and of everything concerning their company, independent profession or activities in accordance with the requirements arising from this company, independent profession or these activities, and to keep the books, documents and other data carriers in such a way that their rights and obligations, as well all relevant details pertaining to the levying of taxes, are clear at all times.

2. Parties with administration obligations:

a. bodies;

b. natural persons who run a company or practise an independent profession, as well as natural persons who benefit from taxable profits from business activities as meant in Section 3.3 of the Income Tax Act 2001;

c. natural persons who are withholding agents;

d. natural persons who carry out an activity as meant in Sections 3.91, 3.92, and 3.92b of the Income Tax Act 2001.

3. The administration includes everything that is kept, registered, or drawn up in accordance with other tax laws.

4. Unless stipulated otherwise by tax law, parties with administration obligations must retain the data carriers referred to in the foregoing paragraphs for a period of seven years.

Turnover Tax Act 1968

Section 34a

The entrepreneur is obliged to keep books, documents and other data carriers or their contents – at the discretion of the inspector – concerning immovable goods and rights to which they are subject for a period of nine years subsequent to the year in which he started to use the goods in question.

Public Procurement Act 2012

Section 2.56

2. The data referred to in the first paragraph shall be retained for a period of at least three years after the date of the awarding of the public contract.

General Administrative Law Act

Section 4:69

1. The grant recipient shall organise and manage an administration in a way that makes it possible to verify therefrom the rights and obligations, as well as payments and revenues, that are relevant to the grant.

2. The administration and the documents related thereto shall be retained for a period of seven years.

Working Conditions Decree

Article 4.10c Files and records

1. The expert referred to in Article 2.14a, second paragraph, or the occupational health and safety services shall keep a personal medical file of each employee who has undergone an examination of their occupational health, as meant in Articles 4.10a and 4.10b.

(...)

4. The results of the occupational health examination shall be recorded in an appropriate form and retained for at least forty years after the most recent exposure to hazardous substances by the employee in question, as will the list of employees, referred to in Article 4.15, and the register of exposed employees referred to in Article 4.53, first paragraph.

5. In the event of the activities at the company or the employer's institution being discontinued during the forty-year period referred to in the fourth paragraph, the documents referred to in the fourth paragraph shall be transferred to the regulator.

Article 4.90 Registration

1. A register shall be used to keep records of which employees are, or could be, exposed to category 3 or 4 biological agents.

(...)

3. The register referred to in the first paragraph shall be retained for at least ten years after the most recent actual or possible exposure.

4. In the event of an employee being exposed or possibly being exposed to a biological agent that could result in infections that:

- a. are persistent or could be latent (as far as is known);
- b. on the basis of the current state of technology, could only be expected to be identified years later;
- c. have a long incubation period;
- d. keep returning, in spite of treatment, or
- e. have severe long-term complications, the register referred to in the first paragraph shall be retained for a correspondingly longer time, but no more than forty years after the most recent exposure.

(...)

[Working Hours Decree](#)

§ 3.2 Retention period

Article 3.2:1

The employer and the person referred to in Article 2:7, first paragraph, of the Act shall retain the data and documents relating to the obligation to keep a register in accordance with Article 4:3 of the Act for at least 52 weeks, calculated from the date to which said data and documents relate.

[Decision by the Minister for Medical Care of 27 June 2019, number 1529221-190512-WJZ, concerning the setting of a retention period for logging](#)

Decision:

The logging referred to in the Electronic Data Processing by Healthcare Providers Decree shall be retained for at least five years from the time when the log entry is written.

[Nagoya Protocol](#)

Article 4.

6. Users retain the information relating to access and distribution for twenty years after the end of the period of usage.

Implementing Regulations to the Wages and Salaries Tax Act 2011

Section 7.5 Compulsory identification

1. Before the date on which the employee starts work, or before the start of the work if the employment relationship has been agreed on the date on which the work starts, the withholding agent shall establish the identity of the employee using a document as meant in Section 1, first paragraph, under 1° to 3°, of the Compulsory Identification Act and shall keep a copy of said document available in the salary administration, for verification purposes.

(...)

4. The withholding agent shall retain the information and copies referred to in this section for at least five years after the end of the calendar year in which the employment relationship ended.

Section 7.9 Provision of information by employee

1. Before the date on which the employee starts work, or before the start of the work if the employment relationship has been agreed on the date on which the work starts, the employee shall provide the following written, signed, and dated information to the withholding agent:

- a. his surname and initials;
- b. his date of birth;
- c. his Citizen Service Number (BSN);
- d. his address and postal code;
- e. his town/city and, if he lives abroad, the name of the region and country of residence;

2. The withholding agent shall retain the information referred to in the first paragraph for at least five years after the end of the calendar year in which the employment ended.

(...)

Section 12.1 Payroll tax statement transitional arrangement

(...)

5. The withholding agent shall retain the payroll tax statement referred to in the fourth paragraph with his salary administration for at least five years after the end of the calendar year in which the employment ended.

Aliens Decree 2000

(...)

5. The sponsor provides information from the administration to the minister or the official charged with the monitoring of sponsors in accordance with the rules drawn up by the minister. The sponsor shall keep the administration records for a period of five years after the end of the sponsorship and shall provide on request of the official charged with the monitoring of sponsors the information and documents from said records that are relevant to the monitoring of sponsors.

Higher Education and Research Act

Section 7.3

(...)

5. The successful reviews of students' academic records, referred to in the third paragraph, and the essays produced in that context, shall be retained by the institutional management for a period of at least seven years.

Experiments on Animals Act

Section 15a

(...)

2. Individual files are kept for the lives of every dog, cat, and non-human primate that accompany the animal in question as long as it comes under the terms of this act, and meet the requirements determined by or pursuant to an order in council.

(...)

Termination of Pregnancy Act

Section 11

(...)

2. The medical director of the institution ensures that all doctors working at the institution provide him with all the information referred to in the first paragraph in full and on time in such a way that it cannot be traced back to individual patients. He ensures that this information is retained for at least five years.

(...)

Directive 2010/45/EU on the standards of quality and safety of human organs intended for transplantation

Article 10, paragraph 3

(.....)

b) the data required for full traceability are retained for at least thirty years after donation. The information may be stored electronically.

(.....)

Body Material Requirements Decree 2006

Article 7.3

1. Institutions where body material is applied to people shall register the following information:
 - a. the identification code, referred to in the preamble to Article 4.2, first paragraph;
 - b. the type of material;
 - c. the origin of the material;
 - d. the personal data of the recipient of the material;
 - e. the date and time at which it was applied.

2 The institution retains the information referred to in the first paragraph for at least thirty years.

Artificial Insemination (Donor Information) Act¹⁸

Section 8.

The Foundation ensures that the data are carefully stored for at least eighty years, from the date on which it receives them.

¹⁸ Section 8 only applies to UMCS if the insemination data have not been transferred to the Artificial Insemination Donor Data Foundation (SDKB). Otherwise, the 'Body Material Requirements Decree 2006' Act applies.

Appendix 3. Report of National Archives consultation meetings

Report of the consultation meetings held, in accordance with Section 5, first paragraph under d of the Public Records Decree 1995, between the universities and university medical centres and the National Archives in relation to the selection list referred to in Section 2, first paragraph, of said decree, for the archive documents of the universities and university medical centres for the period starting on 1 January 2020.

The Hague, November 2019

Geert Leloup

Selection objective and importance

During the drawing up of the selection list and the consultation meetings, account was taken of the valuation of the archive documents referred to in Section 2, under c of the Public Records Decree 1995, as part of the cultural heritage and the importance referred to under d of the same section of the data appearing in the archive documents for government bodies, litigants or those looking for evidence, and for historic research.

The starting point of the consultation meetings was the selection objective for archives being retained permanently, formulated as follows in 2010:

The purpose of valuating, selecting, and acquiring public records is to bring together and secure sources that enable individuals, organisations, and social groups to discover their history and to reconstruct the past of state and society, and how they interact. To that end, the public records (or sections thereof) being secured should be:

- a. representative of what aspects of society have been recorded;*
- b. representative of the activities of members (people and organisations) of a society;*
- c. regarded by observers as important, special, or unique, because they reflect important, special, or unique social developments, activities, people, and organisations at a particular time.*

(Letter to the House of Representatives from the Ministry of Education, Culture, and Science and the Ministry of the Interior and Kingdom Relations regarding the strategy for selecting public records, 17 December 2010).

Organisation of the consultation meetings

The oral and written consultations about the draft selection list between the representatives of the archiving organisations and the representative of the general state archivist took place between January 2019 and August 2019. The draft selection list was also presented to an external expert in accordance with Section 3, under d, of the Public Records Decree 1995, as amended with effect from 1 January 2013. The requested written recommendations from this external expert were received on 18 October 2019.

The participants in these consultations were:

as archive and subject-matter experts on behalf of the archiving organisations:

Eveline Bregonje, project manager for drawing up the selection list on behalf of the UPIR

Kees-Jan Vermeulen, project supervisor for drawing up the selection list

as representatives of the general state archivist:

Geert Leloup, Senior Staff Member, Valuation and Selection

Olga Raam, Senior Advisor on Strategic Customer Relationship Management

Esther van Hofwegen, Senior Advisor, Strategic Customer Relationship Management

as external expert:

Els Versteegt, Head of Operational Management and Support, Rathenau Institute

Report of the consultation meetings

Scope of the selection list

This selection list applies from 1 January 2020, the start of a new calendar year.

The following selection lists shall cease to apply on 31 December 2019:

- Basic Selection Document Academic Education 1985- (BSD). Government Gazette nos. 12639, 12650, 12649, 12657, 12661, 12665, 12669, 12643, 12646, 12651, 12656, 12664, 12670, dated 26 August 2009;
- Basic Selection Document Public and special university medical centres 1985-. Government Gazette no. 4469, dated 22 April 2013.

The selection list applies to the following archiving organisations: University of Amsterdam, Amsterdam University Medical Center, Vrije Universiteit Amsterdam, VU University Medical Center, Protestant Theological University, Delft University of Technology, Eindhoven University of Technology, University of Twente, University of Groningen, University Medical Center Groningen, Leiden University, Leiden University Medical Center, Maastricht University, Maastricht University Medical Center+, Radboud University Nijmegen, Radboud University Medical Center, Erasmus University Rotterdam, Erasmus University Medical Center, Tilburg University, Utrecht University, University Medical Center Utrecht, Wageningen University & Research, and the Open University.

In performing their tasks, special universities and special university medical centres, as private-law organisations, have a public authority function only in relation to a limited number of processes (in particular, processes 61, 65, and 123), and only these are subject to the provision of the Public Records Act. This concerns the following universities and university medical centres: Vrije Universiteit Amsterdam, VU University Medical Center, Radboud University Nijmegen, Radboud University Medical Center, and Tilburg University. The other processes do need to be carried out, but they are not subject to the Public Records Act.

Public universities and university medical centres are subject to the selection list in its entirety. The special universities and university medical centres should have an officially approved selection list only for the aforementioned three processes and should therefore always observe the retention periods for these processes that are stated in this selection list.

Selection objective and basis of the valuation

Valuations and selections are currently made in the context of the aforementioned selection objective formulated in 2010, and with the help of the new valuation method introduced by the National Archives in 2015, (see the publication *Belangen in balans, een handreiking voor waardering en selectie van archiefbescheiden in de digitale tijd*), with valuations having been arrived at following a system analysis and risk analysis. The new valuation method is expanded upon through the use of five System Analysis – Retention Criteria (SA-B).

Additional to these retention criteria are the possibility of exceptions to the destruction of archive documents pursuant to Section 5, first paragraph, under e, of the Public Records Decree 1995: they are described in part 1.6.4 of the selection list.

Comments with the explanatory texts

Reading guide section

A reading guide has been added by the representatives of the archiving organisations, at the request of the external expert.

1.2 Scope section

At the request of the representative of the general state archivist, the representatives of the archiving organisations have refined the description of the scope in part 1.2, specifically for the special universities. The same applies to the overall date of entry into force in part 1.3. The representatives of the archiving organisations also confirmed that the two Basic Selection Documents referred to in the same part (1.3) are the only ones that should be closed.

Part 1.5 Brief history and duties of universities and UMCs

Part 1.5, with its description of the history and duties of universities and UMCs, has been set out in greater detail by the representatives of the archiving organisations, at the request of the representative of the general state archivist. The structure of the relationship with other government bodies has also been set out more clearly. The parties agree that this text should be formulated in general terms because of the generic area of application of the selection list. However, at the request of the external expert, greater emphasis is being placed on the social role of universities and UMCs, in particular in the field of research and its valorisation. The fact that the private-law legal person of a special university can be a religious organisation has also been added.

Part 1.6.1 The description elements

The definition of the term 'indicative retention period' has been adjusted following the consultation meetings between the representatives of the archiving organisations and of the general state archivist. The original definition was: 'If the retention period is indicative, the stated retention period is advisory, and from which an institution may deviate if it has compelling reasons for doing so. These reasons must be recorded'. The representative of the general state archivist pointed out that the selection list periods that apply to archiving organisations must be applied to the extent that they come under the Public Records Act. There is also the impression that this provision applies to every university and UMC, both public and special. The paragraph quoted was subsequently scrapped by the representatives of the archiving organisations. Additionally, it was made clear that public universities and UMCs should always observe all the periods mentioned in the selection list and that only special universities and UMCs may deviate from the indicative periods on the list if they do not relate to public authority functions.

1.6.2 Using the selection list – risk analysis

The external expert noted in relation to part 1.6.2, and more specifically to the paragraph concerning the risk analysis, that the risks for some processes are not mentioned. The representatives of the archiving organisations emphasised that – where statutory periods are lacking – these are based on the experiences of various users and are therefore more difficult to describe. Fundamental discussions about important information objects like examinations will be described in more detail in Chapter 3.

Part 1.6.2 Using the selection list – mentioned information objects

For part 1.6.2, and more specifically the paragraph concerning the mentioned information objects, the external expert was of the opinion that it is not easy to apply the rule 'if information objects occur in multiple processes, ...the longest retention period given for these information objects (including metadata) should be observed'. The representatives of the archiving organisations responded that the starting point is that the relevant organisations manage their information in accordance with the law, and are therefore able to apply this rule.

Part 1.6.2 Using the selection list – cleaning up

The representatives of the archiving organisations and of the general state archivist together looked at how 'cleaning up' can best be defined and demarcated – an example was used to make clear that only 'rough versions, working documents, duplicates, and invitations to meetings' could be cleaned up.

Part 1.6.3 Criteria for valuations

Various points of the valuation method were amended and modified on the advice of the representative of the general state archivist by the representatives of the archiving organisations. Outdated selection criteria were replaced by the aforementioned System Analysis – Retention Criteria (SA-B), which also offer greater scope for justifying the permanent retention of implementation-related information.

During the meetings, the representative of the general state archivist questioned the use of the other valuation: 'Not taken place V [period]' with some processes in the categories '2.1 Management and structure of the organisation', '2.2 Development and implementation of policy', and '2.3 Research'. He feared that this would give a distorted picture, given that only successes are retained. An additional and practical objection is that this valuation implies a manual and therefore time-consuming selection at file or case level. However, the representatives of the archiving organisations argued that the processes at the highest, strategic, level could also involve large numbers of cases and, consequently, that it is necessary to be able to destroy information relating to cases that have not materialised. They emphasised, too, that important or advanced cases that were ultimately discontinued could be exempted from destruction. An explicit provision to this effect was added to part 1.6.4. An additional argument is that cases that did not materialise can be reconstructed using archive documents with a permanent retention valuation. The representative of the general state archivist agreed to the proposed approach on the basis of these arguments.

Part 1.6.4 Destruction exemptions

The criteria for making exemptions were set out in further detail by the representatives of the archiving organisations. Partly on the basis of suggestions by the representative of the general state archivist, the hotspot monitor process has been set out in more detail, while other possible destruction exemptions are envisaged. The representatives of the archiving organisations also proposed to add the option of exempting a 'representative selection' from destruction. The intention here is to provide the option of designating representative collections of archive documents for permanent retention, such as course material. The representative of the general state archivist agreed to this proposal. An earlier draft by the representatives of the archiving organisations mentioned 'random sample retention', but the representative of the general state archivist pointed out that a random sample constitutes a complete valuation that has to be substantiated (in terms of its content, and statistically) and which cannot be included as a general option in the explanatory notes; he feared that the exception would become the rule.

Chapter 3 Explanatory notes and justification

Various parts of Chapter 3 have been amended and added to on the basis of the recommendations of the external expert. In part 3.4.2, the list of information objects has been added to. In part 3.5.1, it has been made clear that when valuing raw research data, the reusability and accessibility may be taken into consideration, with a view to open science, among other things. In part 3.6.2, the external expert proposed to give meetings with companies a permanent valuation as this can help document the possible influence of companies on research. However, the representatives of the archiving organisations and of the general state archivist are of the view that

this runs counter to the division on the selection list between strategic and tactical consultations: the latter – including with companies – is of no fundamental interest. Also, reports without any context are not easy to interpret. However, they do emphasise that every meeting concerning research plans and research conditions (in their words: ‘how a research project is carried out and under what conditions’) is regarded as a strategic consultation. The external expert suggested that the financial documents under part 3.6.7 regarding reimbursements and facilities of high-level individuals should come under a separate process and be designated for permanent retention. She referred to the recent disquiet in this area. The representatives of the archiving organisations stated that there are a number of practical and legal objections. Practical, because it leads to the obligation to keep separate accounting records. Legal, because after the passing of statutory deadlines, it is not possible to put forward any evidence of irregularities. Of course, there is the possibility of using destruction exemptions, but that is more from the perspective of heritage.

Part 3.7.3 General Data Protection Regulation

The General Data Protection Regulation (GDPR), which took effect in May 2018, featured regularly during the meetings between the representatives of the archiving organisations and the representative of the general state archivist. The representative of the general state archivist welcomed the inclusion of the GDPR as a factor in the setting of the retention periods in the selection list. He emphasised that the GDPR still permits the designation of personal data for permanent retention, and that in the context of this ‘archiving in the public interest’, the right to be forgotten would not always necessarily apply.

Other general topics of discussion

The representative of the general state archivist asked about a few possibly missing processes. The representatives of the archiving organisations are developing some processes on this basis. For other processes – such as the running of crèches, restaurants, museums, heritage collections, and botanical gardens – the representatives of the archiving organisations explained that this is not, or is no longer, done by the universities or UMCs themselves, and consequently do not come under their archiving responsibilities. The external expert remarked in turn that because of the large number of processes, many of which are described in abstract terms, she was unable to assess whether any processes were missing. The representatives of the archiving organisations emphasised that completeness was an important point of focus when drawing up the selection list, in part by presenting drafts to a working group in which different universities and UMCs were represented (see part 1.4 of the selection list). The conclusion of this working group is that the selection list is complete. The external expert made the same comment, *mutatis mutandis*, about the list of information objects. The representatives of the archiving organisations emphasised that it is impossible to include every information object on the selection list. The aim was to have a (non-exhaustive) summary of the most important information objects.

The representatives of the archiving organisations endorsed the comment by the external expert that each university and UMC will have to implement the list at their own organisation in their own way, a process that itself will have to be carefully considered and documented. An important guarantee is offered by the Public Records Decree 1995, which stipulates that a statement must be drawn up of every destruction.

Discussion of individual work processes

Process 2: Appointments of board members

The external expert asked about the relationship with process 118 and particularly about the appointments of research school directors. The representatives of the archiving organisations

clarified that for research schools, appointments come under process 2, and for universities/UMCs, process 118. The selection list must always be used in accordance with the institution carrying out the process.

Process 5: Management and administration regulations

In the case of the other valuation 'Not taken place V one year after completion', the external expert proposed that it be changed from 'V one' to 'V five', in view of the importance of proving and reconstructing decision-making processes. The representatives of the archiving organisations clarified that, for this process, 'not taken place' relates to meetings at which insufficient numbers of participants were able to be present.

Process 7: Long-term policy plans

The external expert made the same recommendations for this process as for process 5. The representatives of the archiving organisations agreed in this case, and changed the other valuation to 'Not taken place V five years after completion'.

Process 9: Collaboration between government-funded institutions for higher education and healthcare (Joint regulations)

The external expert made the same recommendations for this process as for process 5. The representatives of the archiving organisations agreed in this case, and changed the other valuation to 'Not taken place V five years after completion'.

Process 14: Disputes between representative advisory body and management

The valuation of this process is based on whether or not there is an influence on policy, among other things. The representative of the general state archivist asked how clear-cut this distinction is, and whether it is easy to interpret. The representatives of the archiving organisations replied that the majority of disputes have no influence on policy because they are more likely to relate to the implementation of existing policy, for example. The representative of the general state archivist was satisfied with this explanation. The external expert said that disputes that do not affect policy could be relevant from the point of view of transparency and the burden of proof. She recommended that the valuation be termed 'Not taken place and influences policy V ten'. The representatives of the archiving organisations did not share this opinion: disputes that do not materialise are not relevant. However, a dispute can be put in the exception category if it has not had any influence on policy, but is nonetheless noteworthy as an example of a 'show of strength'.

Process 17: Strategic consultations and process 18: Tactical consultations

The representative of the general state archivist asked whether the teaching committees and examinations boards that come under process 18 (with a 'destroy' valuation) should be listed under process 17 (with a 'permanent retention' valuation). For the teaching committees, the representatives of the archiving organisations commented that they only issue recommendations on education policy and that their recommendations are retained under the 'Developing an education policy' process. They are therefore of the view that the reports of the teaching committees can be destroyed after some time. Regarding the examinations boards, the representatives of the archiving organisations argued that they decide on individual cases, and that the importance of this lapses after the student in question has graduated. Also, the most important general information is recorded in annual reports. The representative of the general state archivist agreed with the proposed demarcation of the processes.

Process 23: Quality assurance system

The representatives of the archiving organisations stated in a first draft that the audits carried out do not come under this process. It was subsequently not clear to the representative of the general state archivist to which process they could be linked. In response, the representatives of the archiving organisations have since described and valued audits in this process.

Process 30: Setting fees

This process was initially valued by the representatives of the archiving organisations as 'to be destroyed', on the assumption that this was stipulated by the government. The representative of the general state archivist proposed that it be designated for permanent retention, because the archiving organisations have acquired greater autonomy in this area and the archive items can be used to document their vision for access to education by students/international students. The representatives of the archiving organisations accepted this reasoning and have designated the process for permanent retention.

Process 36: Accreditation of degree programmes

Following a comment by the external expert, the representatives of the archiving organisations changed the retention period for refusal from 'V three years after completion' to 'V five years after completion'. After all, this information could be useful for evaluating degree programmes.

Process 38: Revocations of degree programme accreditations

The representative of the general state archivist proposed, on the basis of the description of this process, that it be designated for permanent retention. The representatives of the archiving organisations made clear that these revocations are generally the result of degree programmes being discontinued, which is also covered in process 39, 'Discontinuation of degree programmes'. Any notorious cases may be exempted from destruction. The representative of the general state archivist agreed to this approach.

Process 43: Collaboration between degree programmes

The external expert made the same recommendations for this process as for process 5. The representatives of the archiving organisations agreed in this case, and changed the other valuation to 'Not taken place V five years after completion'.

Process 44: Teaching and Examination Regulations

The representatives of the archiving organisations suggested in a first draft that if there are general Teaching and Examination Regulations (OERs), consideration could be given to faculty OERs being designated for destruction. This wording was refined at the proposal of the representative of the general state archivist in such a way that allows the destruction of these OERs after a precise period of time.

Process 48: Course units

An initial draft of the selection list contained the following stipulation in the comments field: 'In view of historiography, an institution may decide to retain a representative selection of degree programmes'. The representative of the general state archivist was of the opinion that this is too noncommittal, and suggested a more systematic and structural selection approach for manuals and other study materials that could enable national comparisons between universities and UMCs. This turns out to be impossible, because of both the scale and the particularly heterogeneous (partly published) and sometimes fragmented nature of the material. Moreover, the course catalogues designated for permanent retention offer fairly detailed overviews. The proposal by the

representatives of the archiving organisations was consequently accepted, with the addition of a reference to an additional explanatory note in part 1.6.4.

Process 51: Provision of information to students

An initial draft of the selection list contained the following stipulation in the comments field: 'An institution may ... decide to retain its course catalogues permanently, with a view to their historic significance'. The representative of the general state archivist believes this to be too loosely worded. Both parties agreed that course catalogues should be designated for permanent retention as standard because they contain detailed information about the available degree programmes. This could also be part of the website, based on process 148.

Process 52: Exemptions

The representatives of the archiving organisations explained, in answer to a question from the external expert, that 'not taken place' for this process relates only to applications that were not pursued, not to applications that were rejected.

Process 59: Assessing final projects (theses and the like)

The representative of the general state archivist agreed to the proposed longer retention of final projects, as described by the representatives of the archiving organisations in part 3.4.4. This, after all, represents a continuation and perpetuation of an existing practice.

Process 64: Appeals to the CBE

The valuation of the archive items from this process is largely based on whether or not there is any influence on education policy. The representative of the general state archivist asked whether the exception category could be used in this case. The representatives of the archiving organisations responded that their aim with this process is for all archiving organisations to retain all precedents. The representative of the general state archivist asked why the retention period for 'Appeals to the CBE' is ten years, while for 'Appeals to the CBHO' it is five years. The representatives of the archiving organisations explained that the Examination Appeals Boards form part of their organisations, while the Higher Education Appeals Board is a separate body governed by the Minister of Education, Culture and Science. The representative of the general state archivist agreed to the proposed periods.

Process 68: Collaboration in research

For this process, the external expert proposed that the most important data (metadata) concerning such collaborations be retained for longer, such as the parties, the subject of the collaboration, the amounts involved, period of collaboration, and output produced. For the representatives of the archiving organisations this is not feasible because of the large number of activities and research projects, and the fact that such data – in whatever form – cannot be located separately. However, they did emphasise that the archive items resulting from formal collaborations will be retained permanently, in accordance with processes 6 and 69.

Process 69: Establishment of research school or research institute

Following a suggestion by the external expert, the period for the initial appointment of members, organised at the time of establishment, is to be changed from 'V ten' to 'V seven', analogous to process 118, which applies to all subsequent appointments.

Process 71: Procurement of research projects

The representatives of the archiving organisations assured the representative of the general state archivist that this is a clear and familiar description for and within universities and UMCs. The

process also involves more than funding and should not be reduced to that aspect only. The comments field states: 'Non-successful research proposals may be retained for as long as they have information that is of value to the university or UMC'. The representative of the general state archivist proposed that a clear destruction period be set, but the representatives of the archiving organisations stated that the heterogeneous nature of research makes it impossible to estimate a uniform period, never mind actually set it. The representative of the general state archivist emphasised that universities and UMCs should then assess the risks of longer retention themselves.

Process 72: Research projects

At the request of the general state archivist, the representatives of the archiving organisations substituted 'because it is no longer important' with 'in accordance with the provisions of the project plan' for the period for raw research data, so that agreements about the archiving of such data can be justified and are traceable.

Process 74: Setting up an enterprise

The representative of the general state archivist proposed, on the basis of the description of this process, that it be designated for permanent retention, as it offers an insight into the changing economic role of universities and their interaction with society. The representatives of the archiving organisations responded that archives are very sizeable at universities of technology in particular, and that it is consequently not desirable that everything be retained permanently. The parties agreed to accept the proposal by the representatives of the archiving organisations – that is, to use the exception category for special enterprises. However, in response to a question by the representative of the general state archivist, the 'special' character was further defined as relating to a developer of a ground-breaking or innovative product, an economically particularly successful enterprise with large numbers of employees, etc.

Process 80: Patient medical data

The representative of the general state archivist asked about the reasons for the retention period of 115 years after birth, with regard to certain medical data. The representatives of the archiving organisations responded that this period already features on the existing selection list and is based on the statutory 'or for as long after the expiry of this period as is reasonably necessary to provide the standard of care of a prudent care provider'. The choice of 115 years is then linked to the maximum life expectancy of patients and the importance of the data for the medical treatment of patients, now and in the future.

Process 84: Mandates and delegations

The external expert advocated a longer retention period than five years, with a view to being able to reconstruct any abuses and for reasons of accountability. The representatives responded by changing the retention period to 'V ten years after period of operation'.

Process 89: Enrolment procedures and process 91: Enrolment of non-EEA students

The external expert proposed that a register of enrolments not carried out according to procedure be added as a possible information object, with a view to possible reconstruction of incidents (or series of incidents), and for accountability purposes. This suggestion was not adopted by the representatives of the archiving organisations, arguing that it is not a statutory obligation. Furthermore, rules for creating archives should not be dictated through the selection list.

Process 92: Admission assessments

The representatives of the archiving organisations explained, in answer to a question by the external expert, that 'not taken place' for this process relates only to applications that were not pursued because the student in question had withdrawn their application. An extra valuation for refused applications was added, with the valuation 'V one year after completion'.

Process 103: Appointment of professor

The representative of the general state archivist asked what destructible archive items are meant by 'appointments committee' in the 'Other valuation' field. The representatives of the archiving organisations explained that this relates only to the setting up of the committee and the appointment of its members.

The representative of the general state archivist also asked about other possible sources for the reconstruction of the careers of professors in broad outline. The representatives of the archiving organisations stated that other notable developments (dismissal, etc.) could/will be excluded from destruction. They pointed out the existence of other published sources.

Process 105: Staff evaluation and assessment

The representatives of the archiving organisations answered in response to a question from the representative of the general state archivist that special cases relating to academic integrity come under the exceptions category. They are therefore eligible for permanent retention. The external expert advocated a shorter retention period to protect the employees in question from harmful conclusions from reports of old interviews. The representatives of the archiving organisations pointed out the importance of a well-founded reason for any dismissal and the resulting decision to have a retention period of five years. Conversely, employees can point to previous positive evaluations. This explains why they are keeping the existing retention period.

Process 113: Setting up committees or working groups

The representative of the general state archivist asked whether ad hoc committees should be designated for permanent retention, because they can be an indication of special issues. The representatives of the archiving organisations referred to the large numbers of committees, which are active at an operational level, moreover. For clarification purposes, they included a definition of 'ad hoc committees' in part 3.6.4. The representative of the general state archivist was satisfied with this explanation and addition.

Process 115: Carrying out projects

The representatives of the archiving organisations had initially proposed that projects of a special nature or the core documents be retained. The representative of the general state archivist proposed that everything be designated as destructible but in the case of projects of a special nature, to rely on the possibility of making an exception. The representatives of the archiving organisations accepted this suggestion. Projects of a special nature are further defined as those 'that are important and/or specific to the university'.

Process 128: Information management

The external expert was of the opinion that the one-year retention period for registering mail is too short given that it could be crucial for reconstruction and fact-finding. The representatives of the archiving organisations explained that the registering of mail does not come under this process but in fact gets the retention period of the relevant process. This possible misunderstanding is pre-empted by adding the words 'overviews of' before 'registration of mail'; these overviews are the only archive items that can come under this process.

Process 138: Budgets

The representatives of the archiving organisations proposed that all archive items for this process be destroyed in due course. However, they did envisage the possibility of 'an institution retaining its budget if it can be seen as a vision document'. The representative of the general state archivist was of the opinion that a budget is and remains an important document that gives a good overview of budget choices and the underlying implicit policy choices. The parties eventually agreed that only the budgets for the whole organisation should be retained and that every budget should be destroyed after ten years.

Process 148: Announcements

The representatives of the archiving organisations responded in the affirmative to a question from the representative of the general state archivist of whether internal communications also come under this process and added a description and valuation to that effect. A period of one year was regarded as sufficiently long by the representatives of the archiving organisations.

At the proposal of the representative of the general state archivist, a reference to a recent guideline by the National Archives will be added for the university and UMC websites. Both parties agreed that messages on social media should come under this process, although further guidelines should be devised for their valuations and archiving.

Process 142: Grant applications

The external expert advised that information about grants received from companies for medical research be kept longer than 'seven years after adoption'. The representatives of the archiving organisations pointed out that this is a statutory period, including for companies. Additionally, financial agreements are generally included in the collaboration agreements.

Process 149: Providing information

This process was added by the representatives of the archiving organisations after a comment by the representative of the general state archivist that there was no process for dealing with requests in the context of the Government Information (Public Access) Act (WOB).

Process 150: Organising an event

The representatives of the archiving organisations proposed that all archive items for this process be destroyed in due course. However, they did envisage the possibility that 'An institution may decide to retain certain information objects from special events and occasions'. The representative of the general state archivist viewed this as too loose and formulated the proposal to designate information of substantial interest (programme, speeches, ...) for permanent retention and all other documents relating to logistical and other aspects for destruction. The representatives of the archiving organisations pointed out the high number of events, plus the fact that the definition of 'event' itself in the selection list is deliberately broad-based. Both parties agreed to accept the proposal of the representatives of the archiving organisations, but also to illustrate 'special events and occasions' with a number of guiding examples.

Process 156: Purchase and sale of immovable property

An initial draft by the representatives of the archiving organisations contained the provision that a deed may be retained if it is important to the history of the institution. The representative of the general state archivist pointed out the limited scope, the legal significance, and the unique combination of these deeds, and proposed that they be designated for permanent retention as standard. The representatives of the archiving organisations accepted this suggestion.

Furthermore, a number of work processes were clarified or explained in response to questions from the representative of the general state archivist or the external expert.

The parties agreed on the formulation and valuations of the remaining work processes.

Appendix 4. Approach and justification of the Universities of Applied Sciences selection list 2016

The Universities of Applied Sciences selection list was devised by a working group chaired by the then *HBO-raad*, the forerunner of the Netherlands Association of Universities of Applied Sciences (Vereniging Hogescholen), with the Saxion and Windesheim Universities of Applied Sciences, the Gerrit Rietveld Academie, and the HAN University of Applied Sciences participating. Hanze University of Applied Sciences, Groningen, and Avans University of Applied Sciences took part (instead of HAN University of Applied Sciences) in the update in 2016.

The participants in the working group had legal and archivist expertise at their disposal, or represented the professional documentary information record keeping at the participating universities of applied sciences. The secretarial duties for the project were carried out by VHIC consultancy firm. Representatives of the National Archives and the State Inspectorate for Cultural Heritage acted as a sounding board.

This selection list is based on the Saxion selection list (adopted on 16 August and 13 December 2011). As well as the public authority functions of the time, the selection list also contained the statutory and other duties that Saxion performed as an organisation. The processes in this list were restructured and expanded, based on a literature study into the functions and duties of universities of applied sciences, including HBO-raad sources. In addition to the literature study, an inventory was drawn up of the duties, information objects, and retention regulations in the Higher Education and Research Act (WHW) and other relevant legislation, including the Education Inspection Act. The proposed Higher Education Quality Assurance Reinforcement Act has been examined, but most points have not been incorporated because of the responses to the proposed act, which led to a postponement of its enactment. What has been incorporated, however, are the intentions expressed by the Minister of OCW for administrative agreements with universities of applied sciences in the wake of the postponement, in her Letter to the House of Representatives of 5 February 2013 (OCW reference number 482604). For the purpose of setting the retention periods for reviews of students' academic records, examinations, final projects, and other items on this selection list, account has been taken of administrative agreements. Before the addition of processes of other universities of applied sciences (see below), the processes described on the Saxion selection list were edited. This involved, among other things, further studies being carried out on the bases, comments being added, and retention periods being amended, where necessary. The source study was supplemented with the study of selection lists of government chain parties of universities of applied sciences and other available sources in the *Handelingenbank* of the *Doc-Direkt* agency of the Ministry of Internal Affairs. Recent regulations and investigations by the Accreditation Organisation of the Netherlands and Flanders (NVAO) and the Inspectorate of Education were also studied, including the assessment frameworks for the NVAO accreditation system (November 2011) and the report by the Inspectorate of Education about alternative graduation tracks in higher education (March 2012).

The findings from the Saxion selection list in relation to its public authority functions were supplemented by rulings by the Council of State in relation to the public authority functions of universities of applied sciences, which contained a tighter definition of these duties. These rulings can be found in cases such as 200502560/1 (ruling of 21 December 2005), 200507749/1 (ruling of 19 July 2006) of the Council of State. The processes and the explanatory notes look at the consequences of these rulings in greater detail.

When making the inventory of processes, retention periods, bases, and information objects, an addition to the processes on the Saxion selection list was found in the retention period lists and the archiving regulations provided by the HAN University of Applied Sciences, the Windesheim University of Applied Sciences, Codarts Rotterdam, Christelijke Hogeschool Ede, Inholland University of Applied Sciences, Iselinge Hogeschool, Amsterdam University of Applied Sciences, Fontys University of Applied Sciences, HU University of Applied Sciences Utrecht, HKU University of the Arts Utrecht, Driestar Christian University for Teacher Education, and HAS University of Applied Sciences. Finally, useful information came from discussions on online forums for universities of applied sciences.

The research results have been processed and commented on by the members of the working group on several occasions. Following this, a review was carried out by Dr Geert-Jan van Bussel, Digital Archiving & Compliance professor at the Amsterdam University of Applied Sciences. The results from this review and subsequent additional research have been processed. From the broad-based selection list of all the duties of universities of applied sciences, an extract was made in a separate selection list for public authority functions. The explanatory notes that apply to public authority functions were kept. This selection list has been presented for adoption to the National Archives, on behalf of the participating universities of applied sciences, accompanied by the review by Mr Van Bussel as an external expert.