

RECORDS MANAGEMENT POLICY

1. OVERVIEW AND PURPOSE

- 1.1 The University recognises that keeping records¹ is necessary in order to carry out its organisational functions and meet its compliance obligations.
- 1.2 As such, the University also considers that effective records management² is an institutional priority.
- 1.3 The purpose of this policy is as follows:
- To outline the importance of, and principles which underpin, good records management;
 - To make clear individual and institutional responsibilities with regard to records management at the University; and
 - To provide a basis from which the University's Master Records Retention Schedule can be understood and utilised.

2. SCOPE

- 2.1 This policy applies to all University records, regardless of how they were created and how they are stored (for example, whether hard copy or digital; held by individuals or in centralised systems), and covers the entire life cycle of records, from creation through to disposal.
- 2.2 This policy applies to, and must be adhered to, by 'all staff' creating and maintaining records as part of their work at the University.
- 2.3 For the purposes of this policy, 'all staff' includes the following, whether remunerated or not:
- Senior managers, officers, and directors;

¹ As defined in the British Standard dealing with records management, BS ISO 15489, a record is: *'information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business.'* Records can be understood as a collection of information used for a specific purpose.

² Records Management guidance from the National Archives explains records management as follows: *'Records management is about controlling records within a comprehensive regime made up of policies, procedures, systems, processes and behaviours.'*

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- Employees (whether permanent, fixed-term, temporary, or casual);
- Contract, seconded, and agency staff;
- Volunteers, apprentices, and interns; and
- Others associated with (i.e. performing services for or on behalf of) the University (for example, agents and consultants).

2.4 Except where a student is also ‘staff’ of the University, or creating and maintaining records as a part of the University’s functions (e.g. as part of research work), this policy does not apply directly to students.

3. RESPONSIBILITIES

3.1 All Staff

3.1.1 All staff are responsible for familiarising themselves with this policy and must adhere to the policy and associated guidance when creating and maintaining records as part of their work for the University.

3.2 Heads of Schools and Professional Services Directors

3.2.1 Heads of Schools and Professional Services Directors are responsible for ensuring that staff in their area are aware of this policy and their responsibilities.

3.2.2 Heads of Schools and Professional Services Directors are responsible for ensuring that records belonging to their School or Division are created, maintained and disposed of in accordance with this policy and related guidance.

3.2.3 Heads of Schools and Professional Services Directors are expected to encourage and promote a culture of good records management within their School or Division.

3.3 The University’s Information Governance Committee (IGC)

3.3.1 The Committee is responsible for supporting and driving the broader information governance agenda at the University, as well as providing assurance that effective best practice mechanisms are in place across the University.

3.3.2 As such, within the context of records management, the Committee is responsible for:

- Approving the Records Management Policy;
- Reviewing and approving the University’s strategic approach to records management and monitoring institutional compliance;

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- Acting as an escalation forum for key records management-related issues;
- Acting as ambassadors for good records management; and
- Ensuring the provision of necessary resources and systems required to enable strategic and effective records management.

4. POLICY

4.1 Importance of Good Records Management

4.1.1 Good records management is crucial to the effective running of the University. Without it, the University is likely to waste time and resources and risks reputational damage and non-compliance with important legislative and regulatory requirements.

4.1.2 Good records management ensures that:

- Information can be found easily when needed and increases the University's efficiency and accountability;
- The University can be confident that records are an authoritative source of information and provide a solid basis for decision-making, policy development, and service provision;
- Legal and regulatory compliance obligations can be met; and
- Information is protected appropriately.

4.1.3 To ensure that good records management is maintained, the principles outlined in this policy should be adhered to, and records should be managed in accordance with these throughout their entire life cycle, from creation to disposal.

4.2 Records Management Principles

4.2.1 Records should always be kept:

- Where they are needed for institutional business or regulatory and legal compliance purposes, to demonstrate accountability, or to protect the rights of the institution and its staff, students and stakeholders;
- To clearly articulate how things are done and what has happened, and to provide reliable evidence and justification relating to decision making processes; and

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- Where they enable staff to work efficiently and provide details of relevant processes and necessary information required for individuals to carry out the requirements of their roles.
- 4.2.2 Where records are used by multiple teams, there should always be a clear understanding of which area or role has ultimate responsibility for the maintenance of the record.
- 4.2.3 Records should be created and maintained with appropriate security measures and access controls in place, based on the content and value of the records and any applicable legislative or regulatory requirements (e.g. data protection); and information held within records should be classified in accordance with the University's Information Classification and Handling Policy.
- 4.2.4 There should be knowledge of where records are held and how to access them; appropriate storage and filing systems should be used to meet operational needs and to enable records to be retrieved and used by everyone who needs them. Where applicable, it should be clear how records are connected to other records.
- 4.2.5 Where possible, records should be complete and it should be evident when they have last been accessed, used, and/or modified.
- 4.2.6 Records should only be kept for as long as they are required, but they should remain useable and accessible for as long as they are required.
- 4.2.7 Plans should be in place to protect the most business-critical records and mitigate against risk of loss, and records should be created and maintained in such a way as to ensure business continuity in the event of staff or system changes.

4.3 'Master Records' / Retention Schedule

- 4.3.1 Whilst this policy and the records management principles apply to all University records, the University also publishes additional guidance for use alongside this policy which applies specifically to the University's 'master records,' known as a Master Records Retention Schedule.
- 4.3.2 A master record, for the purposes of this policy and associated guidance, can be understood as a core University record which has ongoing institutional, authoritative and/or evidential value (for example, a final published version of a policy, but not the working drafts; or audited Financial Statements).
- 4.3.3 The Master Records Retention Schedule provides more specific detail regarding which records make up the University's master records, how long these should be retained, and recommended disposal action following the end of the retention period (see section 4.4 for further information on 'disposal').

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- 4.3.4 Some pieces of information may form parts of multiple different master records, but the retention periods outlined in the University’s Master Records Retention Schedule refer to records themselves and not the individual pieces of information which form the records.

4.4 Disposal

- 4.4.1 Records should be disposed of when no longer needed to meet current organisational needs or legal and compliance obligations.
- 4.4.2 Disposal refers to the decision about whether a record is destroyed, the archive review process is initiated, or the record is transferred to University Archives.
- 4.4.3 Where destruction is the decision, the same security considerations that apply to the creation and maintenance of records should also be applied to the destruction process (e.g. confidential or sensitive records should be destroyed securely).
- 4.4.4 If routine destruction of records is required, this should be built into systems wherever possible.

4.5 Archiving

- 4.5.1 Records no longer in active use, i.e. no longer required for current business or compliance needs, but with long term historical value should be transferred to the central University Archives for permanent preservation; records should not be archived locally.
- 4.5.2 The University’s Archives document the functions, organisation, and activities of University, and are used by staff, students, alumni, and the wider research community. Both paper and digital records are preserved, and records should be transferred in the format in which they were held when in use.
- 4.5.3 If records need to be sent to archive, the Collections team will provide a proforma for completion, which will ask for confirmation of details about the records, including their format and whether they are open, i.e. accessible to anyone, or closed, i.e. with access restricted – for either a specified time or indefinitely.
- 4.5.4 Advice should be sought from the Collections team if there is uncertainty as to whether a record is appropriate for archiving. Records that should form part of the University Archives are not limited to master records in the Master Records Retention Schedule and other records may be transferred to the Archives following consultation with the Collections team.

5. LEGISLATION AND GOOD PRACTICE

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- 5.1 Lord Chancellor’s Code of Practice on the management of records – <https://ico.org.uk/media/for-organisations/research-and-reports/1432475/foi-section-46-code-of-practice-1.pdf>
- 5.2 Records Management Code Implementation Guides from the National Archives – <https://www.nationalarchives.gov.uk/information-management/manage-information/planning/records-management-code/implementation-guides/>
- 5.3 JISC records management guide – <https://www.jisc.ac.uk/guides/records-management>

Review / Contacts / References	
Policy title:	Records Management Policy
Date approved:	April 2021
Approving body:	Information Governance Committee
Last review date:	March 2021
Revision history:	N/A
Next review date:	April 2022
Related internal policies, procedures, guidance:	Master Records Retention Schedule Archives Transfer process & Records Transfer Form Data Protection Policy IT Security policies Information Classification and Handling Policy
Policy owner:	Division of the General Counsel, Governance and Compliance
Lead contact / author:	Information Manager, Information management team

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