

Records Management Policy

Purpose

The purpose of this policy is to ensure that the University:

- has appropriate records to meet its business needs and the needs of its stakeholders;
- operates records management procedures and practices to maintain, protect, retain and dispose of records in accordance with operational, legislative, regulatory and historical needs. This includes its obligations under Freedom of Information legislation (supplemented by the Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000) to have a policy in operation for records management;
- clearly defines responsibilities and accountability for records;
- provides staff with the resources, knowledge, competences and procedures to create and manage records according to the policy.

Context: Legislation, regulations, standards and other University policies

The University is subject to the provisions of the:

- Data Protection Act 2018, incorporating the GDPR
- Freedom of Information Act 2000
- Environmental Information Regulations 2004
- Reuse of Public Sector Information Regulations 2015

Specific business functions and activities within the University are also subject to specific legislation or regulations, or to professional best practice or relevant ethical guidelines. For example, personnel activities are regulated by employment law, and the assurance of health and safety by health and safety legislation and by guidelines issued by the Health and Safety Executive; finance activities are governed by, among other things, the Finance Acts, the Taxes Acts, the Pension Act 2014, and by ethical guidelines issued by the Institute of Chartered Accountants of England and Wales and other professional bodies.

Records management systems and procedures also inter-relate with a number of other University policies, which can be found on the University's Policies and Procedures web page and are listed at the end of this policy document. .

The University will, so far as is practicable, seek to comply with professional standards and codes of practice including the relevant international standard on records management, ISO 15489, and the EU's formal requirements specification, MoReq2 (Model Requirements for the Management of Electronic Records). It will also seek to comply with other relevant documentation, such as guidance material from The National Archives, and

Records Management Policy V2.0

the codes of practice, and other guidance material from the Information Commissioner. It will co-operate with other higher education institutions and other relevant public authorities with the aim of benefiting from best practice experience.

The University will also, so far as is practicable, comply with relevant guidance in specific business areas, e.g. financial audit requirements.

Scope

This policy covers all records, in any format, created, received or maintained by staff of the institution in the course of carrying out their corporate functions. This policy also applies to all applications used to create, manage and store records.

Records and documentation created in the course of research, whether internally or externally funded, are also subject to contractual recordkeeping requirements.

1. What is Records Management?

- 1.1. A record is a specific piece of information produced or received in the initiation, conduct or completion of an institutional or individual activity. It comprises sufficient content, context and structure to provide evidence of the activity. It is not ephemeral – that is, it contains information that is worthy of preservation in the short, medium or long term..
- 1.2. The University recognises that the efficient management of its records:
 - promotes efficiency and effectiveness: by supporting ease and efficiency of working allowing employees to find easily the information needed;
 - produces reliable and valuable information that is kept secure;
 - protects individuals and the University: it provides evidence of people's rights and entitlements, shows what the University did and why it did it, and gives records a high value as evidence if they are needed in a court of law;
 - reduces costs, particularly physical and virtual storage space: it helps staff not to keep any more records than are necessary and to know when records can be destroyed;
 - ensures that the University's corporate memory survives by transferring historically significant records to the University Archive at Heritage Quay.

2. Policy Statement

- 2.1. The University will treat the information located in its records as a valuable resource. Records will be managed to aid efficient information retrieval, in order that they can be used as effective sources of information. Records which are vital for business continuity will be identified.
- 2.2. All staff are responsible for recordkeeping, and records will be created, maintained and disposed of in a consistent way across the University using the [University's Retention and Disposal Schedule](#).
- 2.3. The University will maintain quality by keeping appropriately complete, authentic, reliable, secure and accessible records of what it does.
- 2.4. The University will encourage staff to develop key information management skills.
- 2.5. The University's records and information will comply with regulations and legal requirements, including making information accessible to others as necessary, as well as protecting information from inappropriate or unauthorised access.

3. Records Management Systems

- 3.1. The aims of the University's records management systems, whether hard copy or electronic, are that:
 - the record is present: the University has the information that is needed to form a reconstruction of activities or transactions that have taken place;
 - the record can be accessed: information can be located, accessed and displayed in a way consistent with initial use, and the current version is identified where multiple versions exist;
 - the record can be interpreted and the context of the record can be established: who created the document and when, during which business process, and how the record is related to other records;
 - the record can be trusted: the record reliably represents the information that was actually used in or created by the business process, and its integrity and authenticity can be demonstrated;

- the record can be maintained through time: the qualities of accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed, perhaps permanently, despite changes of formats.

3.2. These principles apply to all University recordkeeping systems.

4. Responsibilities

- 4.1. The University has a corporate responsibility to maintain its records and recordkeeping systems in accordance with the regulatory environment. The senior post holder with overall responsibility for this Policy is the Director of Digital Information Services on behalf of the University Senior Leadership Team.
- 4.2. The Information Governance Group (IGG), which reports to the Senior Leadership Team, is responsible for defining, approving, overseeing and monitoring Information Management within the University. It ensures that the appropriate policies, procedures and roles are in place to enable compliance with information legislation. It also has responsibility for the dissemination of information, training and promotion of good practice in relation to records management.
- 4.3. Deans, Directors and Heads of Services within the University have overall responsibility for the management of records generated by their activities i.e. for ensuring that records controlled within their unit are managed in a way which meets the University's records management policy. Each School Manager and Service Director will appoint a [Records Management Champion](#), who will act as a first point of contact within that School or Service on records management issues.¹
- 4.4. The University's Records Management Service is responsible for liaising with Records Management Champions, for providing guidance, support and training to units, and for the monitoring of standards. This guidance will include the [University's retention & disposal schedule](#).
- 4.5. All University staff who create, receive and use records have records management responsibilities. Individual employees must ensure that the business functions and activities for which they are responsible are documented

¹ A detailed description of the [role of Records Management Champion](#) was agreed in September 2019.
Records Management Policy V2.0

and recorded appropriately. They must also ensure that the records they create and for which they are responsible are:

- fit for purpose;
- accurate;
- appropriately secure;
- accessible in both the intellectual and physical sense to those with a right to see them;
- maintained and disposed of in accordance with the University's records management guidance of which the retention and disposal schedule forms a part.

4.6. The University Secretary has a particular responsibility in ensuring that the University corporately meets its legal responsibilities with regards to information governance. Day-to-day responsibility for compliance with the Data Protection Act 2018, GDPR, Freedom of Information Act 2000 and the Environmental Information Regulations 2004 is delegated to the University Solicitor and Data Protection Officer and the Executive Assistant to the University Secretary, who have a coordinating and enabling role, and will advise on policy and best practice.

5. Dissemination

5.1. The University's Records Management Service in liaison with School/Service Records Management Champions will promote and assist with the implementation of this policy. This will include:

- ad hoc support, advice and guidance tailored to individual needs;
- a resources bank on the website;
- training sessions: both bespoke for individual areas, such as sessions specifically for Records Management Champions, and general sessions via the Staff Development programme, including induction and refresher sessions;
- development and support of the University's electronic document and records management system;
- monitoring compliance with this policy.

- 5.2. This policy will be held within the electronic document & record management system and will be published on the University's Policies and Procedures web page.

6. Authorisation

This policy was adopted by the Senior Leadership Team on 2 June 2020. It is due for review in 2023.

POLICY SIGN-OFF AND OWNERSHIP DETAILS	
Document name:	Records Management Policy
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Compliance Checks:	Staff training via information governance online training package and associated monitoring
Related Policies/Procedures:	Archive Collection Management Policy Computing Regulations Data Protection Policy and other Governance and Compliance policies and procedures Digital Preservation Framework Email Management Policy Estates policies and procedures Financial Regulations and Finance policies and procedures Health and Safety Policy and related procedures Human Resources policies and procedures Intellectual Property Policy IT Security Policy and related policies and procedures Library policies Mini retention schedule Research and Enterprise policies and procedures Retention and Disposal Schedule Reuse of Public Sector Information Regulations Student Recruitment policies and procedures Student regulations, policies and procedures Sustainability policies and procedures University Business Classification Scheme

REVISION HISTORY			
Version	Date	Revision description/Summary of	Author

Records Management Policy V2.0

		changes	
V1.0	17 Oct 2017	Reverted to V1.0 due to introduction of Framework Minor amendments not requiring committee approval.	Amy-Jo Cameron-Williams
V1.1	11 Dec 2018	Minor amendment not requiring committee approval. Reference made to Data Protection Act 2018 and compliance checks included.	Amy-Jo Cameron-Williams
V2	20 Jan 2020	The policy's purpose, context and scope has been explained more fully. The importance of information security and the historical significance of records has been strengthened. The responsibilities of the Information Governance Group and the Director of Digital Information Systems have been included and Record Administrators have been renamed Records Management Champions. Appendix A has been reviewed and all policies and procedures relating to the management of the records have been moved to the table at the end of the document. The appendix that lists the University's recordkeeping systems has been removed. The updated policy does not have any appendices.	Amy-Jo Cameron-Williams