

Records Management policy

University of London Records management

UoL website link: <http://www.london.ac.uk/955.html>

Email: Records.management@london.ac.uk

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1 Introduction

The University of London is committed to ensuring that the records it produces are managed effectively. This policy statement sets out in broad terms how that commitment should be put into practice. Good records management allows the University to satisfy the needs of corporate accountability, statutory obligations and audit requirements. In addition, effective records management is effective management of resources, helping to reduce costs and avoid wastage.

2 Governance

The University Records Manager and Freedom of Information Officer (URM) is a member of the Information Technology & Governance Group and the Information Security Group to which regular reports are provided.

The University Records Manager (URM) and Freedom of Information Officer is part of the Legal Services Office in the Vice-Chancellor's Department. The URM is responsible for ensuring that effective policies, procedures and guidance around records management are in place.

3 The Policy

Every member of staff at the University makes records management decisions in the course of their work. The University bases its records management training around communicating "5 Rs" of records management, which form the basis of this policy.

1. **Records** are the evidence of our actions and decisions as a University
2. Keeping accurate records is the **Responsibility** of every member of staff
3. There are **Risks** around records (loss, damage, unauthorised access) which need to be managed
4. We should keep our records only as long as they are relevant or as long as we are required to by law and our **Retention** schedules
5. The public has a legal **Right** to access many of our records through FOIA or DPA

4 Records are the evidence of our actions and decisions as a University

A record is any information created or received and maintained as evidence of business by a person or organisation. These records can be paper-based or electronic. Some records are essential for on-going work, such as a student case file. Some records are required to be archived for a statutory period, such as financial records. As a charity and public authority, the University also has a duty to keep some records simply as evidence of what was done and why.

Records are kept by the University for the following purposes:

- **Administrative value**

Records which provide evidence of our actions, activities and decisions as a University

- **Financial value**

Evidence of the way in which our money was obtained, allocated, controlled and spent

- **Legal value**

Records which will provide the source of the authority for actions taken by the University or individuals and show evidence of title, contractual obligations, duties and privileges

- **Historical value**

Records which supply the corporate memory of the central University and its Institutes. This will include records created for the purposes highlighted above, retained for historical reasons.

Records are stored in a variety of location and formats:

- **Paper files**

Paper records stored in offices or transferred to the University's paper record store

- **Shared drives, personal drives and emails**

Records produced day-to-day by staff at their computers and stored in network drives and email accounts provided by the University

- **IT systems**

Systems dedicated to holding information and data to support a specific business process, such as accounts payable, the library catalogue or student registration

A record will be in one of three states during its working life:

- **Current**

This is an 'open' or 'working' record or file, still being updated and added to. These records will usually still be in the possession of their creator or owner.

- **Stored**

This is a record which has been 'closed' or 'declared' but is used as a reference tool for administrative purposes. These records can be stored separately from their creator or owner, for example in the University's paper record store or an electronic records system.

- **Archival**

A record will be considered 'archival' if it is retained after its semi-current 'life' and selected for permanent retention in the University archive or an equivalent digital repository.

5 Keeping accurate records is the responsibility of every member of staff

Most records management decisions are taken by staff in the course of their day-to-day work.

The duty to comply with the Data Protection Act 1998 – with its emphasis on the handling and retention of personal information – is part of the terms and conditions of all members of staff.

Staff are also responsible for following the University's procedures regarding records, which can be found on the University's staff intranet pages.

The University Records Manager will provide the following training and information for staff on records management:

- **Online training**

Online training around information compliance is provided on the Staff Development e-Learning site.

- **Web pages**

The records management page of the University website will feature this policy and relevant procedures.

- **Intranet pages**

The records management page of the staff intranet will feature guidance and practical information for staff around records management. Records management or information compliance issues will be communicated via intranet news items to keep staff informed and maintain awareness.

- **Response to queries / provision of advice**

Staff can contact the records management team by phone or by email for advice on specific issues regarding records or procedures

6 There are risks around records which need to be managed

Risk Management is about identifying what could go wrong and ensuring that appropriate procedures are in place to prevent these risks from occurring.

There are risks around records such as loss, damage or unauthorised access which need to be managed effectively. Staff should ensure that all records, paper or electronic, are stored safely and securely. These provisions should be appropriate to the nature of the data or information held in the record, which can include:

- **Personal data**

The Data Protection Act requires the University to ensure 'appropriate technical measures' are in place around personal information. There are greater risks around 'sensitive' personal information, which includes information about matters such as an individual's health, political allegiance or ethnicity.

- **Financial or commercially sensitive data**

Mishandling of this information could have serious implications for the commercial performance and financial health of the University.

Risks around storage include:

- **Loss**

The loss of records through unauthorised destruction or accidental deletion or – more seriously – the loss of records which can result in unauthorised access (see below)

- **Unauthorised access**

Records being viewed by unauthorised members of staff or the public resulting from accidental loss, user error (such as emailing or posting to the wrong recipient) or through malicious attacks to our IT systems.

- **Unnecessary retention**

Records can be kept longer than they are required, leaving the University exposed to complaints of breaching the Data Protection Act

- **Damage**

Paper and electronic records can be damaged or destroyed if storage locations are damaged by flooding or fire

- **Obsolete format**

Electronic formats can, by virtue of changes in software and technology, quickly become obsolete

Steps to mitigate these risks should be put in place around their records by all Departments. The procurement and implementation of new IT systems holding information should include an assessment of how records will be stored. If the system is replacing another it should also provide a solution for the records held on the obsolete system.

Guidance on risk management around records can be obtained from the University Records Manager at records.management@london.ac.uk.

7 Records should be kept according to our retention schedule

The storage and management of records are potentially time- and cost-intensive. We should keep our records only as long as they are relevant or as long as we are required to by law. A retention schedule, based on legislation and agreed national best practice, is in place at the University and needs to be consulted in any records management decisions. Records in electronic format are subject to the same retention periods as their paper counterparts.

Retention schedules are agreed between the records management team and Departmental teams and subject to regular updates.

A retention schedule is a list of record types or 'classes' with the following information:

- **Description**

What the record contains information on and how it is used (e.g. 'staff training records' or 'budget forecasting')

- **Retention period**

How long to keep the records for (e.g. '7 years' or 'Permanent retention')

- **Disposal Action**

What we do when the record reaches its 'disposal date'.

The benefits of a retention schedule are:

- **Classification**

Identifies value and risk around our record sets

- **Efficiency**

Allows the efficient use of space (both paper and electronic storage)

- **Consistency**

Communicating standard ways to manage our records

- **Accountability**

Protects us in audits and litigation

Destruction of any record produced by the University in the course of its activities, including confidential records, should only be carried out where authorised. There may be legal, administrative or archival retention requirements. Confidential records should be disposed of securely and safely. An audit trail should be kept of University records destroyed.

8 The public has a right to access our records

The public has a right to access our records under legislation such as the Data Protection Act, the Freedom of Information Act and the Environment Information Regulations. Effective records management is therefore needed to enable us to meet our statutory obligations.

- **Data Protection Act 1998**

The University is a registered data controller and is required to process data in accordance with the eight data protection principles set out in the Act. The sixth principle gives individuals the right to request personal data held about them by the University and to object to how this data is being used.

- **Freedom of Information Act 2000**

The Freedom of Information Act (FOI) establishes a right of access to all types of recorded information held by the University. The University has a legal obligation to provide information through an approved publication scheme and in response to requests. The University must respond to a request within 20 working days.

- **Environmental Information Regulations 2004**

The Environmental Information Regulations (EIR) give members of the public the right to access 'environmental information' held by public authorities. The University must respond to a request within 20 working days.

Section 46 of the Freedom of Information Act requires the University to follow the guidelines set down in the Lord Chancellor's *Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000*. The Code requires that the University has in place 'a records management policy, either as a separate policy or as part of a wider information or knowledge management policy'.

9 Further information

For further information please contact the University Records Manager and FOI officer at records.management@london.ac.uk. Further information can be found at the Records Management page on the University's website.

10 Version control

Procedure approved as *Records Management and Archive Policy* November 2002; updated as *Records Management Policy* 13/12/11.

Date	Version	Reason for change	Author
June 2011	0.1	Initial draft	University Records Manager
July 2011	0.2	Minor alterations and changes suggested by Legal and Constitutional Adviser	University Records Manager
December 2011	1.0	Approved by the Information Management Group	University Records Manager
January 2017	1.1	Updated to encompass changes arising from Programme Beveridge and implementation of new offsite storage contract.	University Records Manager