



# Records Management Policy

May 2018

This document sets out the policy governing the retention and disposal of the University's records.

May 2018

<b>Reference Number</b>	<b>Version Letter</b>	<b>Executive Sponsor</b>	<b>Officer Responsible for Policy/ Procedures</b>	<b>Consultation Process</b>	<b>Date of Approval and Committee and/or Executive Officer</b>	<b>Effective Date</b>
LSP001/1718	1	Chief Financial Officer	Head of Legal Services	GDPR Working Party	Executive Committee	24 May 2018

## **Title**

*Records Management Policy*

## **Introduction and Context**

*The University's records and data need to be effectively managed in order to support the delivery and management of its core function, and to comply with its legal and regulatory obligations.*

*This document sets out the policy governing the retention and disposal of the University's records and specifically in relation to those records including personal data and records required for the purposes of legal risk management.*

*This policy applies in the context of the University's Data Protection Policy and more particularly the University's strategic objectives to minimise its use of personal data, delete data without delay when it is inaccurate and keep personal data in an identifiable form only for as long as necessary to fulfil the purposes for which the University collected it.*

*Records may be retained for business needs only to the extent permitted by this Policy and the University's Data Protection Policy, specifically the requirements for anonymisation of personal data.*

### **1. SCOPE OF THE POLICY**

#### **1.1 Purpose of the Policy**

*The purpose of this Policy is to establish consistent and robust controls and accountability for the retention and disposal of the University's electronic and paper-based records which are in accordance with relevant legislation and the University's Data Protection policy.*

#### **1.2 What is covered by the Policy**

*This policy applies to all University records; that is records created, received or maintained by the University in the course of carrying out its business, including the carrying out of research and the fulfilment of compliance with any regulatory requirements.*

*The records may be in any format or medium, including electronic documents, emails, text and social media channels. They may also be stored, managed or hosted elsewhere so agreements of this nature should ensure such arrangements comply with this Policy.*

*A small proportion of the University's records may be selected for permanent preservation to give a lasting record of the University's business. Any such retention will be subject to the University's Data Protection Policy and this Policy and will be agreed in consultation with the Director of Governance and the Head of Legal Services.*

#### **1.3 Who is covered by the Policy**

*All those who access data held by the University including staff must be aware of and comply with the Policy. This Policy does not form part of any employee's contract of employment and may be amended at any time.*

## **1.4 Breach of this Policy**

*Any breach of this Policy and its associated procedures by staff will be investigated in accordance with the University's disciplinary procedure. A serious breach may amount to gross misconduct, and could therefore result in summary dismissal.*

*Any breach of this Policy and its associated procedures by non-staff will be investigated and steps taken in accordance with the law and any relevant contract.*

## **1.5 Policy Ownership**

*The Executive has approved this Policy, the Chief Financial Officer is the Executive sponsor and the Head of Legal Services is the officer responsible for the Policy. Any questions about the operation of this Policy or any concerns that the Policy has not been followed should be referred in the first instance to the Head of Legal Services. The Head of Legal Services is the University's statutory Data Protection Officer in accordance with the requirements of the GDPR.*

## **2. THE POLICY STATEMENT**

*The guiding principles of this Policy are to ensure that the University maintains and destroys its records in a manner that allows it to meet its business needs, manage its legal risks and comply with the law.*

*Those who access records held by the University, including staff, are required to complete the training required under the University's Data Protection Policy, or substantially similar training, to inform them about personal data law so they will have an appreciation of the importance of compliance with this Policy. The Record Management Procedures implement this Policy.*

*Compliance with this Policy will result in:*

- *records that give accurate and relevant information on the University's transactions;*
- *records that are authentic and reliable;*
- *records that are stored within suitable filing systems, enabling easy retrieval and avoiding unnecessary duplication;*
- *access to records that are balanced with security appropriate to their level of confidentiality and importance; and*
- *records being retained for the correct length of time, and disposed of appropriately in line with the University's Records Management Procedures.*

## **3. RELATIONSHIP TO EXISTING POLICIES**

*This Policy should be used in conjunction with other relevant University policies and documents including:*

- *Data Protection and Policy Procedures;*
- *Records Management Procedures; and*
- *Information Security Policy.*

*Records should also comply with any external guidelines, policies or legislation, including the requirements of the Office for Students, the research councils, ERDF, other funders of research and any audits.*

*Please contact Legal Services if any conflict is identified between the University's policies and procedures and any external guidance.*

#### **4. IMPLEMENTATION AND RESOURCES**

*It is expected that Schools and Departments will implement practices to ensure compliance with this Policy, and review them regularly. It is the responsibility of the record owner to ensure that good housekeeping practices are undertaken to ensure the accuracy and relevance of information assets that reside on the University servers. It is strongly advised that any personal or residual information or data that has no value or is no longer required for University purposes should be removed from the relevant drives and servers on a regular basis and in accordance with the University's Information Security Policy.*

*The University's Record Management Procedures provide a list of the records produced by the University, and details of the length of time that they should be retained to meet operational and regulatory requirements. It assigns staff responsibilities for the management of records, and provides the rationale for the recommended time periods, with details of any legislative or archival value considerations.*

*Schools and Departments are required to review records at the appropriate time and, once records are approved for disposal, destroy these records. Paper records if confidential, and/or include any personal data, must be disposed of using the confidential waste disposal service. Where records are not confidential and/or do not contain personal data, they can be destroyed in the "non-confidential" paper bins. Electronic records should be deleted, ensuring that all versions and copies are destroyed.*

*Training material on records management and the Records Management Procedures are available on the Legal Services website.*