

Records Management Policy

Purpose and Context

The purpose of this policy is to ensure that the University's records are:

- appropriate to meet its business needs and the needs of its stakeholders;
- managed in an efficient and effective manner; and
- authentic, trustworthy, and accessible.

This policy clearly defines responsibility and accountability for records and ensures that staff are provided with the resources, knowledge, skills, and procedures required to create and manage authentic and reliable records.

This policy also ensures that the University's recordkeeping practices comply with legal and regulatory requirements. The University is subject to the provisions of the following legislation and regulations.

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

This includes an obligation 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.

In addition, specific business functions and activities within the University are also subject to specific legislation or regulations, or to best practice and relevant ethical guidelines, that impact on recordkeeping. This includes, but is not limited to:

- personnel activities regulated by employment law;
- the assurance of health and safety regulated by health and safety legislation and by guidelines issued by the Health and Safety Executive; and
- finance activities 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.

The University will, so far as is practicable, also seek to comply with professional standards and codes of practice including:

- ISO 15489-1:2016, the international standard on records management;
- MoReq2 (Model Requirements for the Management of Electronic Records), the EU's formal requirements specification for electronic records management systems;
- The Records Management Code of Practice for Health and Social Care 2021; and
- other codes of practice and guidance material issued by the Information Commissioner.

The University will also work with other higher education institutions and relevant public authorities with the aim of benefiting from best practice experience in the area of Records Management.

Records management systems and procedures also have a relationship 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 document.

Scope

This policy applies to:

- all records, in any format, created, received, or maintained by staff of the institution in the course of carrying out their corporate functions; this includes records held in digital and paper form;
- all applications and systems used to create, manage and store records; and
- all staff and affiliates who have access to university records and information.

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

1. Introduction

- 1.1. The University operates records management procedures and practices to maintain, protect, retain, and dispose of records in accordance with operational, legislative, regulatory, and historical needs.
- 1.2. Records are defined as documents, information or data created, received, and maintained as evidence and information by the University in pursuit of its legal obligations and in the transaction of its business.¹
- 1.3. Records must comprise sufficient content, context, and structure to provide evidence of the activity they relate to or come from. They will contain information that is worthy of preservation in the short, medium, or long term. As such they must be appropriately managed throughout their lifecycle.
- 1.4. The University recognises that good records management:
 - promotes efficiency and effectiveness – supporting employees to easily find information needed in the course of their work;
 - produces reliable and valuable information that is kept secure;
 - provides a clear audit trail of activity;
 - protects individuals and the University – providing evidence of people's rights and entitlements and showing what the University did and why;
 - gives records a high value as evidence if they are needed in a court of law;
 - reduces costs, particularly physical and virtual storage space – reducing duplication and helping staff not to keep any more records than necessary and to know when records can be destroyed; and
 - ensures that the University's corporate memory survives – transferring historically significant records to the University Archive at Heritage Quay.

¹ ISO 15489-1: 2016

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 following principles apply to all systems which hold the University's records, whether hard copy or electronic:
 - **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 is accessible.** Information can be located, accessed and displayed in a way that is 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.** It is clear 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, even if the record is migrated to a newer format or system.
 - **The record is only kept for as long as it is needed.** No record is kept beyond its retention period, unless there is a pressing business need to retain it longer. Records with permanent retention are transferred to the University Archive at Heritage Quay when no longer needed by the school or service.

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 School or Service 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.²
- 4.4. The University's Records Management Service is responsible for liaising with Records Management Champions, for providing and regularly reviewing policy, procedure, guidance, support, and training to Schools and Services, and for the monitoring of standards. This will include the [University's Retention and 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 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; and
 - 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. The University's Freedom of Information Officer co-ordinates the University's response to requests for information, including disclosure of records under the Act. The University has published a [Data Protection Policy](#) which governs how records containing personal data should be handled. This policy should be the first point of reference for those with questions about this aspect of information governance.

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:
 - providing ad hoc support, advice and guidance tailored to individual needs;
 - maintaining a resources bank that staff can access;

² A detailed description of the [role of Records Management Champion](#) was agreed in September 2019.

- providing 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;
- developing and supporting the University's electronic document and records management system;
- providing advice and support on implementation of other systems holding University's records, where required; and
- monitoring compliance with this policy.

5.2. This policy will be held within the electronic document and 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 29 June 2023. It is due for review in 2026.

POLICY SIGN-OFF AND OWNERSHIP DETAILS	
Document name:	Records Management Policy
Version Number:	V3
Equality Impact Assessment:	Completed May 2023
Privacy Impact Assessment:	Not required
Approved by:	University Senior Leadership Team
Date Approved:	29 June 2023
Date for Review:	June 2026
Consulted with (Departments / Area of Service / Job Title)	Not applicable
Author:	University Records Manager
Owner (if different from above):	Director of Digital Information
Document Location:	http://wisdom:3797/Records-Management/Policy/RM-Policy.doc and published to the web from https://www.hud.ac.uk/media/policydocuments/Records-Management-Policy.pdf
Compliance Measures:	Staff training; auditing of systems and processes; benchmarking
Related Policies/Procedures:	<ul style="list-style-type: none"> • 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 changes	Author
V1.0	17 Oct 2017	Reverted to V1.0 due to introduction of Framework Minor amendments not requiring committee approval.	University Records Manager
V1.1	11 Dec 2018	Minor amendment not requiring committee approval. Reference made to Data Protection Act 2018 and compliance checks included.	University Records Manager
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.	University Records Manager
V3	June 2023	Minor formatting changes. Changes to the Policy Sign-Off table to comply with Policy Framework template. Major revisions to the purpose and context section to make them clearer, reordering some of the existing text and removing repetition. Addition of reference to the Code of Practice for management of health records in the professional guidance list and removal of reference to guidance from The National Archives as they have removed much of their guidance from their website while it undergoes review. Changed the title of Section 1 to better reflect the contents. Strengthened the section on Records Management Systems,	University Records Manager

		<p>including adding a principle related to retention. References to Units replaced with the more accurate Schools and Services. Removed reference to the executive assistant to the University Solicitor as role no longer extant.</p>	
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