

Records Management Policy

1. Introduction

The University recognises that the efficient management of its records is necessary in order to comply with its legislative, regulatory, funding and ethical obligations, to support its core functions and to enable the effective management of the institution.

Information is a corporate asset and our records are important sources of administrative, evidential and historical information. They are vital to the organisation in its current and future programme operations, for the purposes of accountability, and for an awareness and understanding of its history and procedures.

By adopting best practice in records management, the University will also benefit from increased efficiencies through:

- better use of physical and server space
- better use of staff time through ease of location and retrieval
- improved control of valuable information resources
- compliance with legislation and standards
- reduced costs

2. Aims

The aim of this Policy is to provide staff and managers in the University with a general framework through which to consider the efficient management of their records whilst observing general legal obligations, including those arising under the General Data Protection Regulation and the Freedom of Information Act 2000.

To formalise the view that all records created by the university staff during contracted working hours, including those created during the course of research, are the property of the University. Additionally University of Nottingham aspires to meet the standards for best practice in records management defined by the Practice as set out in the Freedom of Information Act 2000, and aligned with the International Standard for records management, ISO 15489.

The principal aims of records management at the University of Nottingham are to:

- protect the interests of the University, its staff, students and other stakeholders by maintaining high quality information for as long as it is required, and to ensure its timely and secure destruction
- comply with statutory and regulatory requirements affecting the use and retention of records
- support decision making, teaching and research by maintaining accurate and reliable documentation
- support business efficiency and continuity by ensuring information can be quickly located and retrieved and protecting information that is vital to the continued functioning of the University
- provide evidence in litigation
- prevent unauthorised or unlawful disclosure of information by ensuring records are held securely and access is controlled and managed
- maintain the corporate memory
- preserve a comprehensive historical record of the University for future administrative and research purposes.

3. Scope

This policy:

- applies to all records in electronic or hard copy format that are created, received and maintained by university staff in the course of carrying out their role and
- is binding on all those who create or use University records such as staff, students, contractors, consultants, visitors and guests of the University, whether accessing records from on or off-campus
- includes records created, received and maintained in the course of research, whether internally or externally-funded, in addition to any contractual and academic record-keeping requirements
- applies in all parts of the organisation, including the University of Nottingham Malaysia Campus and the University of Nottingham Ningbo Campus

Documents that do not form a record are excluded from the scope of this policy. When information is held by the University solely on behalf of another person (for example a trade union), it is excluded from the scope of this policy.

Where records are transferred between international campuses, they shall be done so in accordance with the Tri-Campus Data Transfer Policy.

4. Definitions

a) Record

All documents or data sources, irrespective of format, which facilitate University activities (e.g. teaching and learning, and research) and business and which are thereafter retained for a set period to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically. The recorded information may be in any form (e.g. text, image, sound) and the records may be in any medium or format, including three-dimensional objects. A record has the following essential qualities:

- **Present** - the information needed to evidence and reconstruct the relevant activity or transactions is recorded
- **Accessible** - it is possible to discover, locate and access the information, and present it in a way that is true to the original presentation of the information
- **Interpretable** - a context for the information can be established showing how it is related to other information, when, where and who created it, and how it was used
- **Trusted** - the information and its representation is fixed and matches that which was actually created and used, and its integrity, authenticity and provenance can be demonstrated beyond reasonable doubt
- **Maintained** - the record can be deemed to be present and can be accessed, interpreted and trusted for as long as necessary and on transfer to other agreed locations, systems and technologies

b) Records Life Cycle

All records have a life cycle from creation/receipt (birth), through into the period of active currency (youth), thence into semi-currency, such as middle-aged closed files that are still referred to occasionally, and finally either confidential disposal or archival preservation. In the digital age, it is especially important to introduce conscious management at the earliest possible stage as this will determine the ultimate extent of control over electronic material.

c) Records Management

The field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including the processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

d) Retention Schedule

A plan for the management of records, listing types of records and how long they should be kept; the purpose is to provide continuing authority to dispose of or transfer records to historical archives.

5. Responsibilities

a) The Registrar

The member of the University's senior management with overall responsibility for this policy is the Registrar. The Registrar has a duty to ensure that The University of Nottingham implements the requirements of legislation affecting management of records with supporting regulations and codes.

b) The Information Management and Security Steering Committee

The Information Management and Security Steering Committee (IMSSC) is responsible for reviewing and formulating policies and standards relating to records management.

c) The Information Compliance team

The Information Compliance team is responsible for providing guidance and developing best practice in records management across the University.

d) Data Officers

A Records Management Framework shall be created to support business areas with implementing best practice in managing their records. Data Officers will be appointed to support a Records Management Framework Policy.

e) Heads of Schools and Departments

Heads of schools and departments have day-to-day responsibility for the management of records generated by their own activities. They will be supported in their responsibilities by trained Data Officers who will be nominated within each School and Department.

f) Record Owners

Individuals responsible for the day-to-day management of records created, received and maintained by the University, and that they are disposed of in accordance with the University's records destruction and disposal guidelines. This is devolved to local business areas rather than managed centrally.

g) All Staff

Individual employees have accountability for ensuring the records they access are complete and accurate records of their activities.

Further policy guidance will be developed by the Records Management Steering Group.

6. Recommended Practice

Procedures and processes should ensure that records are organised on a systematic and recognised basis.

7. Identification of Records

A full inventory of records will be recorded and maintained within a Records Retention and Disposal schedule, held by the Information Compliance team.

All record owners will undertake periodic reviews of their information assets and will report changes in the record groups they control to the [appropriate role].

8. Responsibility for Records Management

Each record will have a nominated record owner; although responsibility for the security measures may be delegated to a nominated individual, accountability remains with the owner. The job title of the owner should be recorded in the Records Retention and Disposal schedule.

It is recommended that a review of information assets is performed at least annually by each Faculty/Directorate.

9. Handling of Records

All records must be classified according to the schedule mandated in the Data Handling Policy and this classification recorded in order that appropriate handling of and access to material is appropriately managed.

All records must be retained and disposed of in accordance with the Records Retention and Destruction Policy. Where indicated, records must be transferred to Manuscripts and Special Collections.

10. Version Control

All Microsoft Office-style records (word processor, spreadsheet etc.) should contain adequate version control to enable the identification of the following information:

- a version control number (0.* indicates a draft. *.0 indicates an approved version. *.* indicates a revision to an approved version, where * = any number)
- the date of the most recent change to the record
- the author of the change
- a brief description of the change

All approved versions (e.g. *.0 iterations) of electronic documents should be saved as a read-only version of the file to preserve integrity of the record.

11. Storage of Records

All records must be stored in a secure and appropriately accessible format for the duration that the university is required to retain them. Access to records should be restricted to those with a right to do so.

Records must never be stored within an email system, such as Outlook. Where an email constitutes a record, it must be transferred to an alternative system, for example, by copying and pasting the email to a hard drive, or by copying and pasting the content to another system or document.

12. Implementing Records Management Policies

Measures will be taken by the university to implement records management policies including:

- Establishing a continuous "Plan-Do-Check-Act" cycle of activities that ensure that suitable practices are documented, reinforced and improved with time. (Documentary evidence of the processes and procedures involved will be required to demonstrate implementation of policy to external parties.)
- Ensuring that all individuals who manage records, understand the policies that are relevant to them and any consequences for non-compliance.
- Using physical security measures where necessary.
- Applying technology where considered appropriate and feasible. For example, to control and log access to systems, data and functionality, or encryption.

13. Historical Records

The University aims to preserve those records designated as having permanent legal, administrative or research value at the earliest possible stage in the records life cycle. Given the rapid pace of technological change in the digital age and the vulnerability of digitally held information, archival status records held solely in electronic formats need to be designated as such soon after creation or receipt. The procedures required to achieve this aim will be developed in consultation with the University Manuscripts and Special Collections and will follow emerging professional practice in digital archives preservation.

14. Records Retention Schedule

The Records Retention Schedule will be reviewed at regular intervals to ensure records are being managed in accordance with legal compliance and professional obligations.

15. Implementation

All policies and guidance relating to records management will be communicated to staff via the University's Governance webpages at <https://www.nottingham.ac.uk/governance/records-and-information-management/records-and-information-management.aspx>

16. Audit

Records management practice across the University will be regularly audited to measure success and identify areas for improvement.

17. Training

The University will provide access to appropriate training in records management.

18. Regulatory Framework and standards

Records management policy and practice will seek to include the requirements of relevant national and international records management standards and codes of practice – including the Lord Chancellor's Code of Practice on the management of records under section 46 of the Freedom of Information Act 2000.

In order to benefit from best practice within the Higher Education Institution community, the University will cooperate with the Joint Information Systems Committee (JISC) and other HEI sector bodies.

19. Relevant Legislation

The University will seek to ensure that its records management policies and best practice guidance facilitates compliance with relevant legislation. Copies of the most up-to-date legislation are accessible from <http://www.legislation.gov.uk/>

- Data Protection Act 2018
- General Data Protection Regulation
- Freedom of Information Act 2000
- The Environmental Information Regulations 2004

- Copyright, Design and Patents Act 1988
- Human Rights Act 1998
- Disability Discrimination Act 1995
- Privacy and Electronic Communications Regulations 2003
- Regulation of Investigatory Powers Act 2000
- Limitations Act 1980
- Code of Practice on the Management of Records (FOI s46)
- International Standard ISO15489

20. References to other policies

- Records Retention & Disposal Policy
- Research Records Management Policy
- Data Handling Standards Policy
- Information Security Policy

21. Document Approval

- Approved by: Information Management and Steering Committee
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- Review Date: September 2019
- Reviewer:

22. Document History

- 1.1: 26/04/18 – Fraser Marshall – substantial revision
- 1.2: 01/05/18 – Fraser Marshall – formatting & minor revisions
- 1.3: 21/0518 – IMSSC – approval of procedure

Appendix 1 – Examples of Records

The following is a list of a few examples of records that are held by the University taken from the current Retention Guide. The purpose is to show the kinds of information deemed to form a record.

- Information documenting the handling of applications for admission: successful applications.
- Information documenting the handling of applications for admission: unsuccessful applications.
- Final versions of publications and presentations made to disseminate research results (NOT interim or final research reports).
- Information documenting marks/grades given to submitted/completed summative assessments and, where appropriate, awards and classifications.
- Information documenting feedback on academic progress, and general academic guidance and support, given to individual taught students.
- Records documenting the administration of academic programmes.
- Master copies of procedures relating to academic award administration.
- Master copies of procedures relating to corporate planning and performance management.
- Information documenting the development of the institution's strategic plan: key records.
- Information documenting security breaches or incidents, and action taken.
- Information documenting leasing-out arrangements for properties.
- Information documenting the conduct and outcomes of space audits.