

Records Management Office Documentation

Version	Date of Change	Notes	Editor
6.0	10/06/2020	Updated process	Annette Reeves
7.0	14/04/2021	Minor revision to system names	Phil Oakman

Disposal of Records Procedure

Contents

Introduction	2
Aim	
Definitions	
Determining what information you have	3
Determining the value of your records	3
How have we made this easier?	4
What about physical records?	4
Records which can be routinely destroyed locally	5
Destruction of Records Flow Chart	6



Introduction

Records are the basis on which decisions are made, services provided, and policies developed and communicated. Evidence of these functions need to be kept for an agreed allotted time, as governed by the University <u>Classification and Retention</u> <u>Schedule</u>.

University records are subject to the requirements of legislation including, but not restricted to, the General Data Protection Regulation (GDPR) (EU) 2016/679, Data Protection Act 2018, the Freedom of Information Act 2000 among other statutes and regulations which inform the length of time records need to be kept.

Records, in any format, may not lawfully be disposed of without authorisation.

Aim

The aim of this guidance is to ensure that individuals are able to recognise records that have reached the end of their records life cycle in their own departments/teams and are aware of the action they need to take in order and to ensure appropriate, legally compliant destruction.

Definitions

Records: Records are the evidence of the University's organisation, policies, procedures, activities and its compliance with legal and regulatory requirements. Records are information in a fixed form that is created or received in the course of individual or institutional activity and preserved (retained) as evidence of that activity for future reference (the complete, final, and authoritative version).

Documents: Refers to an item that is not a record, such as drafts, duplicates of record copies, and materials not directly relating to business activities. In this sense, documents are not usually restricted by retention schedules and can be disposed of without authorisation as soon as they are no longer used. However, it would be prudent to consider storing such information in the relevant areas of SharePoint in order to allow automatic notification of need to dispose. This will assist in preventing the build-up of expired information

Retention Period: These are the periods of time, varying from a few months to permanency, during which a record must be maintained by the University. This is usually determined by statute, legal, regulatory or business compliance, or where these do not apply, by a best assessment of risks involved in destruction against the costs of retention.



Retention Schedule: A retention schedule is a list of records for which pre-determined destruction dates have been established. In the case of the University of Northampton, the retention schedule is combined with the file plan/classification scheme into a single document. This is used as the basis for how long the University should be keeping all data including personal information. Decisions made about retention should also consider the rights of individuals regarding their personal data in relation to the requirements of GDPR and the Data protection Act 2018.

Data Owner: Data owners will primarily be University Officers, Heads of Department and Section Heads who are responsible for ensuring that all records in their area are managed in accordance with this policy

Records Lifecycle: The records lifecycle begins with its creation or acquisition, moves through periods of maintenance and use, and ends with either disposition or accession to the archive.

Determining what information you have

Finding out what information you have can be done by way of an information audit. These will be carried out in each area on a regular basis. An audit tool has been devised and can be provided by the Records Management Office to help guide you.

You need to identify and understand what your area does and the information that it creates, handles, receives and shares. You need to consider all types of information no matter what the format.

Each Data Owner should be responsible for ensuring all digital records are appropriately stored in the University's Electronic Document and Records Management System (EDRMS) – Corporate SharePoint.

Determining the value of your records

Legislation dictates that some University records are kept forever, but that is not the only reason we may keep records. Other records and documents may be of historical value. These may be related to significant policy changes, documents about significant, notable events, people or interactions with communities. If your records contain such information, please ask for this to be reviewed by the Records Management Team for Archival value. There is also a requirement to keep a core student record as evidence of their progress and details of awards, etc.



How have we made this easier?

The University has in place an Electronic Document and Records Management System (EDRMS) which has the capability of recognising when electronic documents are at the end of their life cycle.

Through technology working in the background on your team's folder structures in the Corporate SharePoint, the EDRMS will be able to automatically classify records according to the University's retention schedule and inform the Data Owner/Departmental SharePoint administrator when records need to be reviewed and appropriately disposed of. When deleted from the system they will be locatable for a maximum of no more than three months while the information is cleared from IT backups. After this a stub file may still exist to identify that such a document existed but the actual content will be gone forever.

What about physical records?

When it comes to paper or other physical records, the process is a manual one and relies on individuals identifying how long the records should be kept and what should happen to them at the end of their life cycle. This can be done by searching the <u>Classification and Retention Schedule</u>. The schedule is broken down into broad categories to aid your navigation through it.

Once you have found a description of the records most appropriate for the item you are reviewing, the retention schedule will let you know how long it should be kept, the legal justification for that decision, and then in most cases it will identify if the records may be of historical value, and therefore should be assessed by the Records Management Team.

As with digital records, there needs to be a process of review and authorisation before any records are destroyed. If records for disposal have been identified this should be reported to the Data Owner for them to authorise the records disposal. To make this process as easy and convenient as possible, we have developed an online form to complete. This needs to be filled in by the Data Owner, in most cases the Head of Dept/Faculty, and can be found here.

Once the completed form has been received by the Records Management Team, the records will be reviewed for any archival value. If they are not suitable for accession to the University Archive, the owner of the records will be contacted and advised on how to confidentially dispose of the records.

For paper records this will be by way of confidential waste sacks/shredding. Once the confidential waste sacks have been collected by the facilities staff or contractor, they need



to get such individuals and companies to provide a certificate of destruction. All certificates of destruction must be sent to and retained by the Records Management team.

Records which can be routinely destroyed locally

Records which have no significant operational, informational or evidential value can and should be destroyed at a local level. This should be carried out as soon as the record has served its primary purpose. In such cases a disposal form will not be necessary. For example:

Duplicates – such as printouts, database extracts, "cc" or "fyi" copies of emails and documents, circulated duplicates of master copies etc

Working papers – where the results have been written into an official document and which are not required to support it * not to be confused with draft or preparatory versions of documents which lead to official or substantive versions, which should be retained and only disposed of in accordance with corporate policy.

Transmission documents – standard covering letters, envelopes, compliment slips and other items which accompany documents but do not add value to them.

Emails and copies of emails – where there is **no significant** operational, informational or evidential value to the University of Northampton. Emails that do have significant value should be moved to the folder structure in the EDRMS to be managed.

In-house Publications – which are obsolete or superseded or otherwise useless, for example, magazines, marketing materials, prospectuses, catalogues, manuals, directories, forms and other material produced for wide circulation. In some cases, it may be appropriate to offer one copy to the University archive via the Records Management Team

Announcements/Notices/Confirmations – of meetings and events, notifications, apologies, confirmation of reservation, room bookings and travel arrangements etc (once an invoice has been received)



Destruction of Records Flow Chart

