

Summary Sheet:

Policy Title:		
University Records Management Policy		
Purpose of Policy and to whom it applies		
The University is legally obligated to handle personal data in line with the 6 principles set out in the General Data Protection Regulation (GDPR) 2018 and the Data Protection Act 2018. The policy applies to all members of the University that process personally identifiable information.		
Owner and Department:		
University Records Manager SAS		
Principal contact:		
Phil Oakman		
Dissemination and implementation plan:		
Via University internet, Intranets and advertised during training courses		
Date of Senate approval:		March 2015
Version	Date of Review	Notes
4.0	April 2016	No Changes
4.1	June 2018	Legislation change – amended to reflect GDPR
4.2	March 2019	Minor changes
5.0	April 2021	General rewrite
6.0	July 2022	General rewrite to reflect current University practice
Proposed date of next full review:		July 2024

Policy Document:

1. Introduction and background

- 1.1 The University recognises that efficient management of its records is necessary to support its core functions, to assist with the effective management of the institution, to comply with legal obligations and to provide evidence of such compliance. This policy enshrines Records Management as a central, corporate function that supports all levels of The University of Northampton's corporate activity and obligations.

2. Purpose and scope

- 2.1 To formalise the view that all records created by the University staff during contracted working hours, including those created during research projects, are the property of the University.
- 2.2 The policy applies to all records and documents created, received or maintained by The University of Northampton corporately, or by its staff in the course of their work, in any medium or format and may apply to records and documents of external bodies mandated via University contracts.
- 2.3 This policy applies to all records in hard copy and electronic format that are created, received and maintained by University staff whilst carrying out their University functions. Records are those documents, regardless of format, which facilitate University activities (e.g. teaching, learning and research) and business and which are thereafter retained for a set period to provide evidence of its transactions or activities. Records may be created, received or maintained in hard copy or electronically.
- 2.4 Retention of records must be in compliance with the obligations imposed by the General Data Protection Regulation (EU) 2016/679, as amended as UK GDPR; the UK Data Protection Act 2018; and any applicable national laws, regulations and secondary legislation in England and Wales relating to the processing of personal data and the privacy of electronic communications
- 2.5 The purpose of this policy is to ensure the creation and maintenance of authentic, reliable and useable records, with appropriate evidential characteristics within the University. It aims to promote best practice records management processes which can be implemented and audited.

University Records Management Policy

- 2.6 To formalise the University of Northampton's desire to manage records efficiently and systematically, in a manner consistent with ISO15489 and the Lord Chancellor's Code of Practice on Records Management (under Section 46 of the Freedom of Information Act 2000), to support University operations and meet legislative, regulatory, funding and ethical requirements.
- 2.7 To ensure the University retains appropriate records to support its legal, operational roles and retains those records which demonstrate its historical and ongoing importance to the wider community.
- 2.8 To ensure that records vital to the maintenance, growth and development of the University are retained.
- 2.9 This policy 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.

3.0 Definitions

- 3.1 **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 are 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).
- 3.2 **Documents:** refers to an item that is not a record, such as drafts, duplicates of record copies, information subject to revisions, and materials not directly relating to business activities. In this sense, documents are not usually as strictly governed by retention schedules and can be disposed of without authorisation as soon as they are no longer used. They must however be retained for no longer than the identified maximum retention.
- 3.3 **Retention Period:** These are the periods of time, varying from a few months to permanency, during which a record has to 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.

University Records Management Policy

3.4 **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. All retention decisions must take into account any rights an individual may have under the GDPR and the Data Protection Act 2018

3.5 **Classification Scheme:** A method of organising by systematic identification and arrangement of records into categories (according to logically structured conventions, methods, and procedural rules) information for purposes such as retrieval, storage and retention scheduling. A classification scheme completed to lowest levels with the addition of folders is called a File Plan.

3.6 **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

4.0 Key principles

4.1 Records must be maintained in a manner to ensure they have the following qualities:

- it is in existence (the information needed to evidence and reconstruct the relevant activity or transactions is recorded).
- it can be accessed (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).
- it can be interpreted (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).
- it can be 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).
- it can be 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)

4.2 Appropriate measures must be implemented to safeguard the security of University records in line with the University's obligations and responsibilities

University Records Management Policy

under the General Data Protection Regulation (GDPR) and Data Protection Act 2018

4.3 Documents have less strict processing requirements but must:

- be retained in compliance with the University Records Retention Schedule
- In line with the requirements of the Data Protection Act 2018

4.4 Once the retention period of a record or document is reached and their need to be retained expires, the records will either be destroyed or reviewed for archival value. Where available, this process will be automatically triggered by the Electronic Document and Records Management System (EDRMS) according to the University's Classification Scheme and Retention Schedule. This in turn will prompt review by the Records Management team in conjunction with the Data Owner prior to its review, destruction or admission to the archive.

4.5 Records held outside of the University central EDRMS must follow the same process for review and destruction

4.6 Records that document completed policy and procedural documents and managerial decision making at Committees should be retained permanently. These records will become part of the University's Archive and will provide an enduring record of the conduct of University functions and operations.

4.7 Records management and Data Protection training is offered to all staff as part of the University's Staff Development Programme.

5 Key responsibilities

5.1 All members of University staff are responsible for creating, maintaining and preserving integrity of records in accordance with this policy.

5.2 Document and Record Creators are responsible for ensuring that the processing of such information is in line with the requirements of the Data Protection Act 2018, UK GDPR, the Lord Chancellor's Code of Practice on Records Management, and any other pertinent legislation in force at the time

5.3 University Data Owners are responsible for ensuring the records created in their areas are managed in conformance with this policy.

- 5.4 The Records Management Team are responsible for liaising with Data Owners to disseminate policy and guidance relating to records management and assisting in local implementation.
- 5.5 Document Creators are responsible for reviewing documents and records to ensure they are still required and have not exceeded either the University Records Retention Schedule or the legal limits set by legislation
- 5.3 Staff, students, contractors, consultants, visitors and guests who act in breach of this policy, or who do not act to implement it, may be subject to disciplinary procedures or other appropriate sanctions.

6.0 Links to related UN Policies/Guidance/Regulations

6.1 [GDPR - Data Protection Policy and Procedure](#)

6.2 [Freedom of Information Policy](#)

6.3 [Disposal of Records Process](#)

7.0 Links to related external documents (e.g. QAA)

7.1 [ICO Guidance on GDPR/Data Protection](#)

7.2 [Freedom of Information Act 2000](#)

7.3 [The Environmental Information Regulations 2004](#)

7.4 [Copyright, Design and Patents Act 1988](#)

7.5 [Human Rights Act 1998](#)

7.6 [The Equality Act 2010](#)

7.7 [Privacy and Electronic Communications Regulations 2003](#)

7.8 [Regulation of Investigatory Powers Act 2000](#)

7.9 [Limitations Act 1980](#)

7.10 [Code of Practice on the Management of Records \(Fol Section46\)](#)

7.11 [ISO 15489 Records Management Concepts and Principles](#)