Records Management Policy

From: Chief Information Officer	**Date:** May 2018

1 Relevant Law

1.1 Data Protection Legislation as defined in the **Glossary of Terms** and includes the **Data Protection Act 2018** and the **General Data Protection Regulations**.

2 Introduction

2.1 This policy forms part of the University of Southampton's (The University) Information Governance Framework and is designed to ensure and demonstrate that the University is complying with its obligations under Data Protection Legislation.

2.2 The University's information is used as the basis on which decisions are made and services provided and the University is dependent on its records to operate efficiently and account for its actions. This policy defines the aims in records management to ensure information, whether in paper or electronic format ("Records"), are handled efficiently and effectively at all times so that the University meets regulatory and internal requirements.

3 Scope

3.1 This policy applies to University of Southampton staff, students, agency staff, visitors, contractors and third parties (Users).

3.2 This policy applies to the records of the University and any records owned by a third party that the University supports.

3.3 University records are subject to the retention requirements of this policy as set out in **Schedule 1** including:

3.3.1 Administrative records;

3.3.2 Records in electronic format; and

    3.3.3 Personal Data as defined in the **Glossary of Terms**.

4 Aims

4.1 This policy supports the following aims in records management:

    4.1.1 **Accountability**: adequate records are maintained to account fully and transparently for all actions and decisions, in particular, to protect legal and other rights of Users or those affected by those actions, to facilitate audit or examination and to provide credible and authoritative evidence.

    4.1.2 **Quality:** records are complete, accurate, the information they contain is reliable and their authenticity can be guaranteed.

    4.1.3 **Accessibility:** records and the information in them can be efficiently retrieved by those with a legitimate right of access, for as long as the records are held by the University.

    4.1.4 **Security:** records are secure from unauthorised or inadvertent alteration or erasure. Access and disclosure will be properly controlled and audit trails will track all use and changes. Records will be held in a robust format, which remains readable for as long as records are required.

    4.1.5 **Retention and Disposal**: there are consistent and documented retention and disposal procedures to identify the list of documents that must be retained permanently or temporarily due to legal requirements or for valid administrative reasons and to provide for the routine and timely disposal of documents which need not be retained for legal or administrative reasons and have no historical value.

    4.1.6 **Training:** All Users are aware of the principles of the Data Protection Legislation and their record-keeping responsibilities through generic and specific training programmes and guidance and where significant new systems are introduced, tailored training programmes are put in place to guide Users through the process of change.

    4.1.7 **Performance Measurement:** the application of records management procedures are regularly monitored against agreed indicators and action taken to improve standards as necessary.

5 Roles and Responsibilities

5.1 The University is responsible for the retention of records.

5.2 The University will protect its own and other parties' Intellectual Property through control over access to information and the proper licensing of information and software.

5.3 The Chief Information Officer will be responsible for ensuring that this policy is implemented across the University.

5.4 The Director of iSolutions is responsible for software and system audits.

5.5 It is the responsibility of all Users to ensure that they keep appropriate records of their work and manage those records in keeping with this policy and with any relevant guidance produced by the University.

5.6 The University has responsibility for ensuring that it has licences for all proprietary software that is installed on University information assets and maintains and monitors a software license register.

6 Implementation of policy by programmes of work

6.1 The University will provide granular guidance under this policy in the following programmes of work:

6.1.1 Records Creation

(a) Creation of adequate records to document essential activities.

(b) Structured information (content management, version control) to facilitate shared systems based on functional requirements.

(c) Referencing and classification for effective retrieval of accurate information.

(d) Documented guidelines on creation and use of record systems.

6.1.2 Records Maintenance

(a) Assignment of responsibilities to protect records from loss or damage over time.

(b) Access controls to prevent unauthorised access or alteration of records.

(c) Defined security levels for access to electronic records and procedures to amend access authorisations as appropriate when Users move within roles.

(d) Tracking systems to control movement/audit use of records.

(e) Systems in place to enable data subjects to make requests.

(f) Identification and safeguarding key or vital records.

(g) Arrangements for business continuity.

6.1.3 Records Retention & Disposal

(a) Systematic retention schedules and procedures for consistent and timely disposal.

(b) Central storage systems for records requiring long-term retention to include electronic archiving systems.

(c) Mechanisms for regular transfer of records designated for permanent preservation to appropriate archives.

(d) Secure destruction of confidential information including Personal and Special Category Data.

6.1.4 Training and Guidance

(a) Inclusion of records management functions in job processes where appropriate.

(b) Generic and specific guidance on record-keeping standards and procedures.

(c) Training programmes.

6.1.5 Performance Measurement

(a) Development of effective indicators and review systems to improve records management standards.

7 Monitoring compliance and review

7.1 All information governance and security policies and procedures will be subject to periodic audit and review to ensure that they remain fit for purpose and the University remains compliant.

8 Further information

8.1 Additional policies and guidelines concerning particular activities can be found at our **Publication Scheme**.

Document Control

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Barbara Halliday	Director of Legal Services	1	24-05-2018	Barbara Halliday
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*If signoffs are received by email, print names here and archive the sign off emails.
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Schedule 1   Record Retention Schedule

1   Record Retention Schedule

This Records Retention Schedule collates the information into the following categories:

1. Corporate & Governance

2. Finance, Planning & Analytics

3. People & Strategy

4. Engagement & Advancement

5. Health & Safety

6. Estates & Facilities

7. Systems & Technology

8. Student Lifecycle

9. All Faculties (Teaching)

10. Research Institutes

11. Library

12. Other

This list is not exhaustive, but covers the basic types of records stored by the University. In general, section 58 Limitations Act 1980 sets out a time limit of the current year plus 6 years to seek legal redress and this informs the Schedule. If you are unsure about a group of records or they aren't listed here, please contact Legal Services at: legalservices@soton.ac.uk.

The Schedule provides the record holder for each record type listed. For administrative reasons, multiple departments may keep duplicates of the same record. These duplicates should not be kept for longer than the retention period stated in the Schedule.

It is essential that all records are dated and stored in the a manner that clearly identifies the year of creation.

Some records are retained for an academic year, a fiscal year or a calendar year. In the event of the Schedule stating that the records can be disposed of after 3 academic years (for example) it is advisable to read this as 'after the end of the calendar year, three years after the end of the academic year'.

For example, a record created in the academic year 2016/2017, with a 'three-year retention period' could be considered for disposal after 31st December 2020.