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| SOP Title Reference: **Managing Orphaned Records** | logomedium |
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| **GLAS Policies and Procedures**  Managing Orphaned Records | |
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# **Introduction**

This recommended practice provides guidance on how to manage records whose owner is no longer known. Over time, records and data may become abandoned due to many factors including organisational realignment, and a lack of procedures for managing the transfer of owners when a member of staff leaves SGUL.

# **Purpose**

Each SGUL record must have an assigned owner and custodian. However, ownership of records can become complicated when staff move to other departments, leave the university, or departments either amalgamate or separate.

Managing orphaned records requires support from Governance Legal and Assurance Services (GLAS), Information Services and the impacted Research Institutes and Professional Services Departments. The records and any available metadata will need to be reviewed to identify where possible potential owners. Consultation with GLAS may be necessary to determine if orphaned records qualify for destruction or continued storage.

It is recommended that systematic reviews of both records to determine if they need to be retained and who has access to file shares take place to ensure robust management of the records.

# **Scope**

This procedure should be followed by all SGUL employees and contractors who dispose of records or locate orphaned records in the course of their business.

# **Procedure**

**Roles and responsibilities**

Institutes and Professional Services: alert Information Asset Owner, assume ownership, on behalf of SGUL, of records generated, modified or received by staff.

GLAS: provide guidance on retention of records.

**Recommended practice**

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| **1** | **Develop an action plan for orphaned records** Once orphaned records have been identified an action plan to resolve the lack of ownership should be developed   * Consider what resources are necessary to carry out the action plan * Set a timeframe for carrying out the work while also ensuring the work is executed timely |
| **2** | **Inform the Records Manager**  The records manager can provide guidance on retention and which Information Asset Owner to approach. |
| **3** | **Analyse and classify records to identify potential owners**  Review records and any associated metadata to determine record types and content to assist in identifying appropriate ownership of records. You should take into consideration:   * Have the records met their retention requirements and therefore eligible for disposal? * Do the records appear to be duplicates i.e. HR or Finance records located in a location other than HR and Finance? * Can ownership be defined from [metadata](https://www.sgul.ac.uk/about/our-professional-services/information-services/information-governance/documents/information-governance-definitions.pdf#id_token=eyJ0eXAiOiJKV1QiLCJhbGciOiJSUzI1NiIsIng1dCI6ImF0aXQ4UGtiWHRnbjkxTlAtb01feHBGLThpZyIsImtpZCI6ImF0aXQ4UGtiWHRnbjkxTlAtb01feHBGLThpZyJ9.eyJpc3MiOiJodHRwOi8vY21zLXN0Z2Vvcmdlcy11bmkuY2xvdWQuY29udGVuc2lzLmNvbS9hdXRoZW50aWNhdGUiLCJhdWQiOiJXZWJzaXRlQWRmc0NsaWVudCIsImV4cCI6MTYwNjg0MTY0MSwibmJmIjoxNjA2ODQxMzQxLCJub25jZSI6ImYyZTYwNzdlZjRlZDQzMzBiNjM3OWVkMjJjODA1OTliIiwiaWF0IjoxNjA2ODQxMzQxLCJzaWQiOiI3NDk5YTYxZjljMWU1ODI3OTA1NjdlYTE3MDIwZjI5YiIsInN1YiI6IjRhODRjNjE5LWQxY2YtNDRlZS05NDRlLTRjNWJjY2YxZmI1NiIsImF1dGhfdGltZSI6MTYwNjg0MTM0MSwiaWRwIjoiaWRzcnYiLCJhbXIiOlsicGFzc3dvcmQiXX0.ZimQlDEu9SNQr_DwIU900g7kfSiWDOcro6Kr6k5s8nR1j27kemmQWIQynrvkYyADO1D7aT6aQOMI8ANetYbZ3d4uKVPdsH1Jn0U83cEng6F5vmm9zgBEjs_hX98h5dbKj7SkaqrrXmgkgSBLio_OIJgTZ5X28G3DBEUbBxDP6NPi58rp9oxy8_uj14__Y1Wzu82hwEkQQVIBj1iQ6b6NYfsqb5U7WFKjPwEcPGzgj9lllcs_XAsnvP01p2Ydvh-6HCpw4llA3yCEydiUaOsOWf1DZaTpvxwtjsAjLba2ASJRrJsvozNN8VkrHYsl1AgbtZhZaDb-SiZybPjjQm-vdg&scope=openid&state=8dca8005cd7d48d3a58218dda1fadef0&session_state=tV35mvplawdPy49ODAnc5ire4M-RvOV-KUJzkI3yqww.2640e6eb3b9a4d877f1705ac1ecd1acf)? * If the records need to be retained, does the associated metadata need to be improved? |
| **4** | **Review of records**  Once the record owners are identified or after applicable reviews take place, records should be reviewed with the Information Asset Owner prior to being transferred or disposed of. After management approval is obtained the records can be transferred. |
| **5** | **Migrate records to new owners**  Once management approval has been obtained for the transfer of records they should be migrated to the appropriate owner. This may involve transferring physical records to their new location or updating the access rights of a network drive. The records owners will determine the best repository for the records.  Once migrated the new owners will be responsible for managing the records in line with records management policies. |
| **6** | **Establish regular stewardship of action plan developed until closure**  Review the action plan periodically to ensure the timeline and targets are being met. |
| **7** | **Document lessons learnt** |

# **Records where no owner is found**

Should you find that having completed a review of the records and you are still unable to locate an owner, then placing the records out of reach and deleting them after 6 years should be considered.

If you feel you need to consider this option contact the Records Manager for guidance. Final approval for taking this step will be granted by the SIRO.

This option will not apply to all orphaned records; it should only be used as last resort should all other options fail.

# **Procedure Maintenance**

This procedure will be reviewed annually by the Records Manager

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| Related documents | | [Records Management](https://www.sgul.ac.uk/about/governance/policies/records-management)  [Retention and Disposal Policy](https://www.sgul.ac.uk/about/governance/policies/retention-and-disposal) [Disposal Form](https://www.sgul.ac.uk/about/governance/documents/Records-Disposal-Form.docx) | |
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