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| **GLAS Policies and Procedures** Records Management Policy | |
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**Contents**

[SOP Title Reference: Records Management Policy 1](#_Toc15551874)

[Records Management Policy 1](#_Toc15551875)

[1. Introduction 3](#_Toc15551876)

[2. Purpose 3](#_Toc15551877)

[3. Scope 4](#_Toc15551878)

[3.1 Roles & Responsibilities 4](#_Toc15551879)

[4. Policy 5](#_Toc15551880)

[5. Retention Schedules 6](#_Toc15551881)

[6. Preservation Holds 6](#_Toc15551882)

[7. Archive and Special Collections (Archive) 6](#_Toc15551883)

[8. Compliance 6](#_Toc15551884)

[Document Information 7](#_Toc15551885)

[Document History 7](#_Toc15551886)

# Introduction

The Records Management Policy provides a framework for managing St George’s, University London (SGUL) records and information. The policy provides a primary framework for all other records management policies.

Records belong to SGUL rather than an individual or group and are both an asset and an important source of legal, evidential, research, student, and historical information. Records are vital in understanding the University’s current activities and history.

British Standard BS10025:2021 Management of Records: Code of Practice states that ‘in the course of operations and activities, people and IT systems in an organization produce and accumulate what might be called data, documents, information, documented information or records, or a combination of all these, and other related terms. For the purposes of this British Standard, all such organizational outputs produced and accumulated in the course of operations and are records – regardless of the terms that are used for them, their medium or format, the type of technology or system on which they are created and captured, when they are created, why they are captured and maintained, or their value to people or to an organization.’ [[1]](#footnote-1)

This policy applies to records regardless of format created and received during the conduct of the University’s activities.

# Purpose

The Records Management Policy’s purpose is to ensure SGUL records are effectively managed according to regulatory and organisational requirements by all staff whether permanent, contracted, or temporary to ensure:

1. All records are held in the appropriate repository and have adequate metadata applied to them in order to manage them throughout the lifecycle.
2. All records are either disposed of or Archived once the retention period has been met.
3. The University can demonstrate it is complying with its legal and regulatory obligations.
4. The contents of records can be trusted as being a full and accurate representation. The record will be complete and unaltered, with clear and traceable indications of authorised annotations or additions.
5. All records can be found, retrieved, reproduced if required, and interpreted.
6. A records accessibility is maintained for as long as required, regardless of changes in formats.

Furthermore, successful records management:

1. Promotes a culture that supports the value of effective records management and supports a records management program.
2. Reduces the amount of hardcopy items held in departments and the amount of data stored in IT systems that is then backed-up.
3. Ensures records are classified according to the SGUL records retention schedule and handled in accordance with the schedules.
4. Supports the work undertaken by the Freedom of Information Officer and the Data Protection Officer.
5. Allows the University to identify records of historical significance and ensure they are transferred to the Archive.

# Scope

The Records Management policy must be followed by all SGUL employees and contractors who create and handle records as part of their day to day activities at the University.

# Roles & Responsibilities

1. The Information Governance Steering Group ratifies the Records Management Policy
2. All Heads of Department are responsible for:
   1. Agreeing with the Records Manager retention periods for records owned by their departments.
   2. Ensuring approved records management procedures are implemented and adhered to in their departments.
   3. Considering the information management lifecycle and information management implications when planning new systems or procedural changes.
   4. When required identifying a member of their department who can act as a records management champion to:
      * 1. Champion records management processes and policies within their departments.
        2. Maintain destruction certificates for departmental disposals.
        3. Alert the Archivist to records to be archived.
        4. Act as a contact for project work.
3. The Director of Information Services is responsible for:
   1. Maintaining systems of records ensuring confidentiality, integrity, and availability (CIA) of the records is maintained.
   2. Ensuring systems conform to the records management policy.
   3. Ensuring that authorised destructions or deletions are actioned.
   4. The Director of Information Services is the Senior Information Risk Owner (SIRO) taking overall ownership of SGULs Information Risk Policy.
4. The Records Manager is responsible for:
   1. Developing and supporting records management activities at the University, monitoring compliance, and providing advice and support for all records produced by the University.
   2. Training department champions in what has to be done at the University to achieve compliance with records management policies and practices.
5. The Data Protection, Freedom of Information, and the Information Risk and Security Officers are responsible for:
   1. Advocating the management of records in accordance with the relevant information security and records management policies.
6. All staff, whether permanent, contracted, or temporary are responsible for ensuring:
   1. Records are stored in the appropriate repository.
   2. Records have a retention schedule applied.
   3. Records can only be accessed by those members of staff who require access in order to carry out their duties.
   4. When a member of the team moves on from their current role or leaves the University any records in their care are passed to their manager or a colleague for safekeeping.

# Policy

SGUL records must be managed throughout the lifecycle:

Create == Capture == Organise== Pluralise

##### Create

All staff whether permanent, contracted, or temporary are responsible for creating and maintaining accurate records of their work undertaken for the University.

##### Capture

Records are captured into a system as evidence of the activity that contributed to their creation.

##### Organise

Records are controlled, accessed, and managed as evidence of their function or role as university memory.

##### Pluralise

Records are organised, managed, and retained for the primary purpose or their historical or cultural value.

# Retention Schedules

SGUL has a legal obligation to retain certain records for a defined period of time; the University may also set the retention period for some records at its own discretion.

Retention schedules benefit the University by standardising our approach to retention and disposal and by following the schedules we can all ensure compliance with legislation, regulations, and University best practice.

Retention schedules apply a set period to retain a record for before it is reviewed for disposal or transfer. However, this only applies to the controlled record; duplicates made for working purposes should be kept for only as long as required and then destroyed, duplication should be avoided wherever possible with the duplicate never kept for longer than the controlled record.

Records should never be retained past their retention period “just in case” and few records have a rationale to be retained indefinitely.

# Preservation Holds

A preservation hold which can also be known as a preservation order, hold order, document hold, or litigation hold is a legal instruction directing an organisation to refrain from destroying or modifying records or information no matter what format they are held in that could be have bearing on a pending or anticipated investigation or lawsuit.

Upon termination of the hold records that were impacted will have the appropriate retention schedule applied once again.

# Archive and Special Collections (Archive)

The Archive is home to records that document the history, functions, and development of the University. The retention schedules record what is of historical significance to the University. Examples include but are not limited to:

1. Medical school records e.g. minute books
2. Photographs
3. Artefacts

If you would like an item to be considered for archiving consult the Archivist who will evaluate the records.

# Compliance

Any department wishing to assess their compliance with this policy should contact the Records Manager for assistance.

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| Related policies | Data Protection Policy  Freedom of Information Policy  BS ISO 15489-1:2001 Information and documentation – Records Management – Part 1: General  BS 10008 Evidential Weight and Legal Admissibility of Electronic Information 2014  Retention & Disposal Policy  The SGUL Retention Schedules  Archive Collections Development Policy  Archive Policy  Information Security Policy |

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| Document History | | |
| Version | Date | Summary of change |
| 1 | 16/04/2018 | Original version. |
| 2 | 01/08/2019 | No charge |
| 3 | 28/09/22 | **Introduction**:  Updated the meaning of ‘record’ with the latest definition in British Standard  **Introduction:**  Tidied up wording on what the policy applies to.  **Purpose:**  Added point that accessibility to records is maintained for as long as they are required.  **Roles & responsibilities**  Revised role of record management champions based on discussions in the IGSG.  **Policy**:  Switched to the lifecycle continuum from the traditional lifecycle to better represent the fluidity of records, especially electronic records, and align with the Digital Curation Centre’s curation lifecycle model for research data management outputs. |
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1. BS 10025:2021 Management of records. Code of Practice p. 2 British Standard Institute 2021 [↑](#footnote-ref-1)