



Cardiff
Metropolitan
University

Prifysgol
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Caerdydd

Records Management Policy

Board of Governors Approval	11 th April 2017
Lead:	Richard Walters
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Introduction

This policy provides a mandate for the records and information management function and a framework for supporting standards, procedures and guidelines for the management of the University's records. Within all relevant processes and procedures the University will apply the following principles.

Principle 1: Information is a corporate resource.

- 1.1 The University's records are important sources of administrative, evidential and historical information. They are vital to the organisation in its current and future operations, for the purposes of accountability, and for an awareness and understanding of its history and procedures.
- 1.2 The University recognises records management as a core corporate function (part of a wider information management function) and organisational arrangements that support records management are reflected in:
 - The University's Records Retention Schedule;
 - the corporate Risk Management framework;
 - Information Governance training for staff.

Principle 2: We keep records of what we do.

- 2.1 Records are recorded information produced or received in the initiation, conduct, or completion of an institutional or individual activity. They comprise content, context, and structure sufficient to provide evidence of the activity regardless of format (paper or electronic).
- 2.2 The University has a commitment to create, keep and manage records which document its principal activities. It will define roles and responsibilities, including the responsibility of individuals to document their work in the form of records. It will then use those records appropriately to ensure that records are captured into a record keeping system and maintained for as long as they are required.

Principle 3: Our information complies with regulations, standards and legal requirements.

- 3.1 The University will ensure it keeps the records it needs for business, regulatory, legal and accountability purposes.
- 3.2 The University is committed to creating, keeping, and managing records which document its principal activities in accordance with all statutory requirements. It will comply with the legislative and regulatory environment within which it operates. This will include generally applicable legislation, such as:

- Freedom of Information Act 2004 and Data Protection Act 1998;
- Civil Evidence Act 1995;
- Regulation of Investigatory Powers Act 2000;
- Health and Safety legislation;
- Employment legislation.

3.3 The University will seek to comply with relevant Codes of Practice and guidance material from the Information Commissioner, the National Archives and the Joint Information Systems Committee (JISC). It will co-operate with other higher education institutions and relevant public authorities with the aim of benefiting from best practice. The University will seek to comply with relevant guidance in specific business areas, such as financial audit requirements.

Principle 4: Our information is accurate and fit for purpose.

- 4.1 All staff who create, use, manage or dispose of records have a duty to protect them and to ensure that any information that they add to a record is accurate, complete and necessary.
- 4.2 The University will ensure that these records will be subject to particular controls so that their evidential value can be demonstrated if required by showing them to:
- be authentic; that is, they are what they say they are;
 - be reliable; that is, they can be trusted as a full and accurate record;
 - have integrity; that is, they have not been altered since they were created or filed *or* if they have been legitimately altered, there is sufficient version control in place for audit purposes;
 - be usable; that is, they can be retrieved, read and used.

Principle 5: Every record will have an owner responsible for its maintenance and eventual disposition.

- 5.1 Records will be effectively managed throughout the records life cycle, by means of a published Retention Schedule. This will define how long the University needs to keep particular records to satisfy legal, financial and operational requirements and will identify records which should be preserved as part of the permanent archive.
- 5.2 Master sets of records and the format in which they will be kept, will be defined and the owner clearly identified in the Retention Schedule thereby creating a mechanism for the elimination of unnecessary duplicate records. The creation of duplicates or records in alternate formats is discouraged, but where needed, they should be retained only for as long as is strictly necessary. When a duplicate record is created, the task of maintaining the master record should remain the duty of the holder identified in the Retention Schedule.

5.3 Every Unit and School will be responsible for ensuring that:

- retention schedules and disposal decisions are implemented by properly authorised staff;
- records scheduled for destruction are destroyed in as secure a manner as required by the level of confidentiality or security markings they bear;
- details of the destruction of records are kept so that it is possible to provide evidence that destruction took place as part of routine records management processes.

5.4 Records selected for permanent preservation and no longer required by the University will be transferred to archives.

Links to other University Policies

- [Data Protection Policy](#)
- [Freedom of Information Policy](#)
- [Environmental Information Policy](#)
- [Openness Policy](#)

Policy Review

The University will formally review this policy at intervals of 3 years and/or following major organisational or technological changes.

Annex A - Scanning Records/Digitisation

Introduction

Scanning paper records into an electronic format is an increasingly tempting solution for dealing with records. Whilst scanning can provide obvious business benefits, it is important the University recognises the record keeping issues that result from scanning records. It is not an inexpensive procedure and is not necessarily a good solution for the long term preservation of records. It is not usually a good idea to scan unless you are improving the way in which the records are accessed. **The process of scanning must be documented and authorised by the appropriate Head of Unit or School having sought advice from the Senior Information Compliance Officer.**

The decision to scan

The following range of considerations should be taken into account before making a decision to scan paper records into an electronic format.

- Return on investment
 - **How often are the records likely to be accessed?** When records need to be accessed frequently, from remote locations or even simultaneously by multiple users, scanning can be a cost effective solution.
 - **How are the records likely to be searched for?** With the correct indexing and provision of metadata, electronic documents can be easily located. In addition the document's content can be easily searched using keywords provided it is in a machine readable format e.g. Microsoft Office documents, E-mails, PDFs with Optical Character Recognition (OCR).
 - **How long are the records likely to be required?** If the retention period is not long (less than 2 years) then it is not likely to be worth the expense.
 - **Are the paper records particularly large or unwieldy?** Some records provide a challenge for the scanning process. If there is a significant amount of preparation required (removing staples, unfolding paper, removing extraneous documents etc.) then it is possible the cost of the scan will outweigh the benefit.

- Evidentiary value of the scanned record
 - **Are the records required for audit purposes?** If your records are likely to be scrutinised by an auditor, particularly an external one (e.g. WEFO), you **must** consider the requirements of the auditors before committing to scanning. If there is large scale funding at stake, it may not be worth the risk to scan.
 - **Legal admissibility** – The fact that a document is copied may reduce its weight as evidence, unless there is sufficient authentication evidence to convince the court that it is an accurate copy.

The Scanning Process

- Quality Control

Appropriate checks should be made to ensure the paper records are being transferred properly into an electronic format. When considering how rigorous your quality check needs to be, you should consider the potential damage to the University if the document was lost.

The following information must be documented and retained along with any scanning project:

- who carried out the scanning process
- when the scanning occurred
- the equipment used
- the process followed
- the quality control measures observed

- Technical Obsolescence

Technology used to access electronic records is advancing at a great rate. If the records need to be maintained for a long period of time, the system used to store the data must be planned for. Where at all possible, an appropriate corporate system should be used to store electronic records. Portable storage devices (CD/DVD, USB, external hard drives) should not be used as permanent storage devices.

- Document Preparation

Typically, preparation will vary depending on the nature of the documents but includes the removal of staples, clips and bindings, followed by sorting and orientation of documents prior to loading the scanner. Document preparation procedures should in no way impair the capture of information from the document.

Unless retention data is captured through another process, batches should be in groups that have the same destruction date. Throughout the process, batches should be clearly identified and retained in their batches to allow for retrieval of an individual document if required. If there is personal data included in the documentation, the responsible officer carrying out the scan must remain at the scanner until the job is complete and all batches of paper should remain secure at all times.

- Storage as Electronic Documents

Consider what metadata (information about the documents) will need to be made to describe and organize the electronic copies. This metadata may be recorded in something as simple as a file-naming convention or as complex as an indexing system. **Remember, the primary reason for scanning is to facilitate access to the records.**

Once a record has been scanned, the scanned record should become the record relied upon for business, with the original hard-copy being either archived or destroyed. Simultaneous use of both hardcopy originals and electronic copies is not good practice and is likely to lead to error.

If there is any personal data in the documentation, the electronic copy must be stored securely, ideally on a corporate system.

- Using 3rd party scanning service

There are many 3rd party providers of scanning services that warrant consideration, particularly if there are insufficient staff available to carry out the scanning with the necessary level of quality assurance. The aforementioned considerations should be useful to ensure the provider is giving you the service you require.

If there is any personal data in the documentation, the service provider must sign a Data Processing Agreement to ensure they understand their duties under the Data Protection Act. Once the data has been received back from the service provider, it must be stored securely.