RECORDS MANAGEMENT POLICY

Version No.	Policy Owner	Reason for Change	Approving Body	Approval Date
1.0	FOI/Records Management teams	Initial version	University Management Committee (May 2009)	May 2009
2.0	Information Governance Unit	Routine update/revision	Digital Campus Sub-Committee	December 2014
3.0	Information Governance Unit	Major review due to length of time since previous review	Digital Campus Sub-Committee	July 2026

1. Introduction

1.1. Records can be defined as "information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business"[1]. For the purpose of this policy a broad interpretation is taken and 'records' should be understood to mean:

- *any and all recorded information held by or on behalf of the University.*

All University records irrespective of format or medium are subject to this policy.

1.2. Records Management is the discipline of managing records in any format throughout all stages of their 'lifecycle', including creation, capture, storage, retrieval, retention and disposal (by destruction or formal transfer to the University Archives for permanent preservation).

1.3. The University recognises the importance of creating, capturing and managing complete and accurate records to support its functions and activities. Effective and efficient management of records is essential to:

- support effective and informed policy formation and decision-making;
- demonstrate good governance and contribute to the effective management of the University;
- improve transparency and accountability;
- support core University functions;
- protect intellectual property;
- protect the corporate and institutional memory;
- comply with legal and regulatory obligations[2]; and
- comply with best practice guidance on managing records as set out in the Scottish Minister's Code of Practice on Records Management by Scottish Public Authorities[3].

1.4. Important institutional priorities can be impacted positively by good records management practices, for example:

- reduction in storage costs, particularly digital;
- effective use of staff resources; and
- sustainability and environmental goals, including carbon reduction.

2. Purpose

2.1. The purpose of this policy is to:

- demonstrate the University's commitment to good records management;
- outline the principles which underpin good records management;
- provide a framework for the creation, management and disposal (by destruction or formal transfer to the University Archives for permanent preservation) of records within the University; and
- make clear individual and institutional responsibilities with regard to records management.

2.2. This policy will form part of a suite of policies and procedures that support the University's approach to information management and governance.

3. Scope

3.1. This Policy applies to:

(a) all University records created, received, used, maintained and disposed of during University work and business, including research records;
(b) all members of staff;

[1] ISO 15489-1:2016
[2] Including responding to requests under Data Protection, Freedom of Information and Environmental Information legislation
[3] Section 61 Code of Practice on Records Management by Scottish Public Authorities under the Freedom of Information (Scotland) Act 2002.

(c) any other individuals conducting work for or on behalf of the University including (but not limited to): temporary staff; honorary staff; visiting staff; casual staff; contractors/contracted organisations; members of University committees or governance bodies; voluntary and agency workers; students who are employed by the University, undertaking University research or otherwise working on behalf of/representing the University; and suppliers;
(d) any records created or held by third parties on behalf of the University;
(e) all University records irrespective of format, e.g. hard copy or digital; and
(f) all University records irrespective of where they are held or stored. This includes any system, application or technology used to create, receive, store, delete, or undertake any other operation in relation to records, e.g. email systems, messaging applications or any other communications channels. This includes any University or third-party technologies, e.g. external messaging and communications tools and covers University records held in personal devices and/or accounts.

4. Principles

4.1. University records are recognised as a critical resource central to our success and valued in the same way as other assets.[4] The University recognises the need to manage its records efficiently and systematically throughout their lifecycle from creation/acquisition through to final disposition (which can include continued retention by the creating department or transfer to the University Archives for permanent preservation) and to have organisational arrangements in place to support records management.

4.2. Records must be managed in line with the following Records Management principles to ensure their viability and quality throughout their lifecycle:

4.2.1. Records are present, complete and accurate: adequate, complete and accurate records must be created to document University decisions and actions.

4.2.2. Records are accessible: records must be accessible and available to support University operations as required and to meet legislative, regulatory, funding and ethical requirements. It is possible for authorised individuals to discover, locate and access records when required. The authoritative version can be identified in cases where multiple versions exist.

4.2.3. Records are 'fit for purpose': records can be understood and have context which establishes when and where records were created and by whom[5]. Records can meet any statutory, regulatory, administrative and operational requirements applicable to the University.

4.2.4. Records have integrity: records are reliable, authentic, accurate, complete and protected from unauthorised amendment or deletion/destruction.

4.2.5. Records are secure: appropriate technical and organisational measures (including access controls) are in place to ensure the security, reliability, confidentiality, authenticity and integrity of records. University records should only be created, used, stored, accessed and managed in/by systems or tools approved and/or provided by the University (this includes University-provided services such as OneDrive, SharePoint and Teams, and other systems or external platforms that have been approved for the relevant teaching, research, administrative, partnership, or contractual purpose. Where University records require to be stored or processed outside standard University-provided platforms, approval must be sought through the relevant IT team. The IT team will lead the assessment and, where appropriate, seek specialist input from Cybersecurity and/or the Information Governance Unit before approval is granted.

4.2.6. Records have a defined lifecycle: records have an assigned retention period which indicates how long they are required to be retained and the corresponding action that occurs at the end of that period. This will include identifying certain records that need to be retained permanently, including records that will form part of our 'corporate memory' to be held in the University Archives.

4.2.7. Records should only be retained for as long as is necessary, to meet University requirements (including any requirement to retain for historical value as set out in 4.2.6) and to comply with

[4] In alignment with the Data Principles set out in 3.2 of the University's Data Strategy.
[5] This can be either an individual or business area/department/School etc.

legislative, regulatory, funding and ethical requirements. Retention rules should be documented and made available.

4.3. Records vital to the operation of the University, along with those deemed to be of permanent administrative or historic value to the University, must be identified and securely stored.

4.4. All information management and governance practices in the University should align to this policy and relevant supporting procedures and guidance, where applicable.

5. Roles and Responsibilities

5.1. **All staff** and any other individuals conducting work on behalf of the University[6] are responsible for creating, maintaining and preserving accurate records that support and document their work activities in accordance with this policy and any associated policies, procedures and guidance. All staff must know what information they hold in their respective storage areas (e.g., digital files in OneDrive for Business accounts; hard copy / paper records, held in filing cabinets/ desks) and they must ensure that the records they are responsible for are managed in accordance with the principles set out in this Policy.

5.2. **Senior Staff (including Heads of Departments, Directors, Deans and Senior Officers)** are ultimately responsible for ensuring compliance with this policy in respect of the records they/their business area is responsible for. This includes promoting the policy to staff and taking relevant decisions to ensure that local procedures and actions are taken in relation to records, including approving retention rules.

5.3. The **Information Governance Unit (IGU)** is responsible for this policy and for providing advice and guidance to staff across the University, including helping departments/business areas to determine and document retention policies for their records. IGU also has responsibility for managing an on-campus Records Centre for hard copy semi-current administrative and academic records (which need to be retained for a specified period, for easy retrieval, beyond their immediate operational needs).

5.4. Records created during research (including 'research data'[7]) are covered by this policy (as set out in 1.1) but must also be managed in accordance with the University's Research Data Management and Sharing Policy. **Research and Knowledge Exchange Services** are responsible for providing advice and guidance to research staff and relevant postgraduate research students regarding the management of research records. Records created during research may also be subject to contractual record-keeping requirements, which research staff must ensure that they are aware of and take into consideration when planning how to manage their research records (including research data).

5.5. **Principal and Co-investigators** are responsible for ensuring that their research projects and the resulting records and data are created, managed, curated for long-term preservation and disposed of (where appropriate) in compliance with: this policy; other applicable policies, codes and guidance relating to research data management; and any specific legal, ethical and contractual conditions.

5.6. The University is subject to Data Protection and Freedom of Information legislation, therefore records created in relation to University business/activities may be subject to this legislation. Accordingly, arrangements must be in place to ensure that any records created in relation to University business/activities, including by **individuals or organisations appointed to undertake work** on behalf of the University, are managed in accordance with this policy. Obligations to comply with this policy should be set out in written agreements/contracts, as appropriate.

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[6] As set out in 3.1(c)

[7] 'Research data' is defined in the Research Data Management and Sharing Policy (for the purposes of that policy) as: digital or analogue (i.e. represented in a physical way) information that is created, collected, and/or reused to produce, validate and/or enrich research findings.

5.7. **Archives and Special Collections** in the University Library is responsible for the University Archives and for providing guidance on the general types of records which, once they are no longer required for operational purposes, may be suitable for permanent preservation in the University Archives. It is also responsible for making decisions regarding the acceptance of all records offered to the University Archives and for providing guidance on their transfer. Records intended for permanent preservation are still subject to this policy. This policy recognises that the Information Governance Unit and Archives & Special Collections are distinct functions with different responsibilities in relation to Records Management but work collaboratively across the records lifecycle.

5.8. Any area of the University creating policies or procedures relating to the management of records must ensure that those policies or procedures align with this Policy.

6. Monitoring and Review

The Information Governance Unit (IGU) is responsible for producing this Policy and will review it every 3 years, or earlier if required to take account of changing circumstances.

This Policy will be subject to approval from Information Strategy Committee, or the relevant sub-committee.

IGU will consider the development of methods of monitoring compliance, in line with the University's overall approach to information management.

7. Related University Policies

As noted in the Purpose, this Policy sits alongside other information management related policies, procedures and guidance and should be read in conjunction with other relevant policies. It should be noted that policies can change over time and therefore this list should not be considered comprehensive.

- Archives and Special Collections Collection Development Policy
- Data Protection Policy
- Digital Strategy
- Information Security Policy
- IP and Commercialisation Policy
- Research Code of Practice
- Research Data Management and Sharing Policy
- Strathclyde 2030
- Open Access Policy

8. Additional Information

Additional information and guidance on records management, including records retention is available via:

- the University website Records management pages (publicly available); and
- the Information Governance Unit's Sharepoint page