

Title	University of Glasgow Records Management Policy	
Prepared By	Data Protection & Freedom of Information Office, University Services	
Approved Internally By	Information & Data Governance Group	
Date of Approval	30 January 2023	
Version Number	2023 v.2.1	
Review Process	From 2015 to be reviewed annually by the Information Governance Group (IDGG)	

# **Version Control**

Version	Date	Control Changes	Approved by
1.0	2006		IPSC
1.1	Feb 2016	<ul> <li>Re-ordering of section 4 Responsibilities</li> <li>Addition of section 4.4 – compulsory compliance with Policy</li> </ul>	
1.2	September 2018	<ul> <li>Addition of references to the GDPR Data Protection Act 2018 and Data Minimisation Principle</li> <li>Relocation of Definitions from section 2.0 to Appendix A.</li> <li>Addition of examples of records to Appendix A.</li> <li>Addition of reference to Funding Body and Research Data Management requirements</li> <li>Addition of records retention schedule responsibilities for all staff and Heads of Academic and Service Units</li> <li>Insertion of link in section 4.2 to Digital Preservation Policy</li> </ul>	
2.0	October 2018	<ul> <li>Revision of wording used to explain responsibilities for Heads of Academic and Service Units in</li> </ul>	

		section 4.3	
2.1	January 2023	<ul> <li>Addition of a link to the University's Records Centre in section 4.2</li> </ul>	

### **1.0 Policy Statement**

The University of Glasgow is committed to managing its records and information effectively and efficiently, to support all of its business activities in line with University strategy and compliance with statutory and regulatory requirements. The University, as a Scottish Public Authority, is further committed to meeting the requirements of the <u>Section 61 Code of Practice: Records Management</u> that accompanies the Freedom of Information [Scotland] Act 2002 ("FOI(S)A") as well as the records and information management requirements arising from the Environmental Information (Scotland) Regulations 2004 ("EI(S)R"). Where personal data is held, the University is also required to ensure compliance with The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and adhere to the *Data Minimisation Principle*<sup>1</sup>.

### 2.0 Scope of the Policy

The University of Glasgow's information and records, regardless of medium or format, need to be maintained and disposed of appropriately, in order to ensure that they are:

- complete
- accurate
- reliable and secure
- "fit for purpose" and are able to meet all statutory; regulatory; administrative and operational requirements placed upon the organisation.

This policy will apply to all records and information created, managed and disposed of by the University and its staff.

Some records created within the course of research may be subject to specific records management requirements determined by funding bodies or other external professional organisations. In addition, the University and many funders also require researchers to establish a Data Management Plan (DMP). In such instances, reference should be made to the University's <u>Research Data Management Policy</u>.

#### 3.0 Objectives

All University staff are involved in the creation, receipt, management and disposition of University records. It is therefore essential to ensure that everyone is aware of their responsibilities and of the importance of records and information management. Systematic records and information management is fundamental to the effective operation of the University and this policy seeks to ensure that responsibilities are allocated in relation to the information that members of staff create and manage.

The majority of the University's records require to be held for the short to medium term only. However, there will be a small percentage of records that will be selected

<sup>&</sup>lt;sup>1</sup> The Data Minimisation Principle requires that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (Article 5(c.) of the GDPR)

for permanent preservation by the University's Archive Services, in order to provide an enduring record of the conduct of University functions, business and people, which combine to form the University's corporate memory. Such records also provide an invaluable resource for research.

### 4.0 Responsibilities

**4.1** All members of University staff who create, receive, manage, or dispose of information have responsibilities and must ensure that records are accurate, secure, organised, and disposed of timeously and in accordance with agreed University retention schedules. Specifically, members of staff are responsible for:

- Ensuring that there are documented records retention schedules in place for all information for which they are responsible, regardless of location, and that these retention periods are adhered to
- Managing documents and records in accordance with University procedures
- Familiarising themselves with this Policy and University records and information management guidelines
- Seeking advice from the Data Protection & Freedom of Information Office (DP&FOI Office) when there is uncertainty regarding the appropriate action to take with respect to the management of records

**4.2** The Data Protection and Freedom of Information Office's Records & Information Management Service is responsible for:

- The development and maintenance of the University's records and information management programme including the development of policy, and working with local information asset owners and record owners to produce institutional and bespoke records retention guidance
- Developing guidance and detailed training for all staff on records and information management
- Co-ordinating complaints from, and investigations by, any relevant third-party such as the UK Information Commissioner or the Scottish Information Commissioner on records management issues
- Developing and maintaining policies and procedures, in conjunction with Archive Services, on the use of the <u>University Records Centre</u> for the secure storage and retrieval of semi-active records
- Ensuring, in conjunction with Information Services, that any records (regardless of format) to be retained on long term/permanent basis are appropriately preserved

**4.3** Heads of Academic and Service Units are responsible for:

- Ensuring that records are managed in accordance with agreed institutional, and where relevant bespoke, retention schedules
- Promoting good records management practice locally
- Ensuring that where records fall outwith the main institutional records retention schedules, bespoke schedules are established in conjunction with the Records & Information Management Service

- Authorising and signing off on bespoke records retention schedules
- **4.4** Compliance with this Policy is compulsory for all staff employed by the University of Glasgow. Any member of staff who fails to comply with this Policy may be subject to disciplinary action.

For further information please see <u>http://www.gla.ac.uk/services/dpfoioffice/rims/</u> or contact:

**DP&FOI Office** 

recman@gla.ac.uk

## Appendix A. – Definitions

- 1. **Records management** is the field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.<sup>i</sup>
- Record: 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 <sup>ii</sup> Some examples of records would be examination/progression results, minutes of meeting, reports, invoices, staff files, attendance records or programme handbooks. The above definition applies regardless of format e.g. hard copy, email, spreadsheet or corporate IT system.
- 3. **Retention schedule:** Actions for the management, and dates for the disposal of records in a particular class determined on the basis of administrative; legal; fiscal and audit requirements
- 4. **Disposition:** The final action on a series of records, e.g. destroy, permanent preservation
- 5. **Archives:** Records selected for permanent preservation as part of the University's corporate memory and as a resource for research

<sup>i</sup> ISO 15489-1:2001

<sup>ii</sup> (ISO 15489) – 1:2001