



Information and Records Management Policy V2.1

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Information and Records Management Policy

1 Introduction

1.1 Glasgow Caledonian University recognises that information is a valuable corporate asset and that the records of the University are essential sources of business, evidential, and historical information. The University recognises the demanding and evolving legislative context in which it operates and its obligations under the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) and as a public authority under the Freedom of Information (Scotland) Act 2002. It is committed to good practice in records management to sustain its core functions and meet its legislative and regulatory obligations. The University is committed to operating in line with international standards and the Scottish Government Code of Practice.¹

1.2 The records of the University are the information created, received and maintained in pursuance of legal obligations or for business purposes. Some of University records are selected for permanent preservation as part of the University's corporate memory in the University's archive. The archive contains a rich collection of records about the University and wider society which are of educational, cultural and research importance.

1.3 This policy will be published on the University website and any amendments or revisions will be noted within the document control section. A review will be undertaken on an annual basis with content being updated as appropriate. Policies and guidelines may be altered at any time if amendments are deemed necessary.

1.4 Records Management is a corporate responsibility which ensures the adoption of procedures and systems that allow the most efficient control of the information resources of the University. It ensures that records are kept only as long as they are needed for commercial, legal or administrative purposes; in a manner that manages information risk; that records of historical importance are identified; and that records are stored in the most cost-effective way.²

1.5 The policy applies to University staff. Staff are responsible for ensuring that appropriate information compliance arrangements are captured in any contract or other form of agreement or understanding, formal or informal, with any third party.

1.6 The Head of any Departments or other units which deal with external agencies processing university records is responsible for ensuring that such agencies agree in writing to appropriate arrangements.

1.7 This policy applies to all situations where the University creates, receives, manages and maintains records. It includes information stored in any format including but not limited to: electronically, paper, CCTV, photographs, film and audio.

¹ British Standards, ISO 15489:2001, Information and Documentation – records management, 2001; Scottish Ministers' Code of Practice on Records Management by Scottish Public Authorities.

² Appendix A provides a glossary of terms

1.8 Training, guidance and procedures will be developed to support compliance with this policy.

2 Aims of the Policy

The aims of the University's Information and Records Management Policy are to give expression to the Information Assurance Charter by establishing overarching arrangements to ensure:

- A systematic and planned approach is taken to records management which encompasses records from creation to disposal.
- That the right information is available to the right people at the right time.
- Compliance with statutory requirements and good practice.
- Improved awareness of the importance of record management and the responsibilities of all staff.
- Improved information security.
- Assurance that University records, worthy of permanent preservation, are transferred to the University Archives in a systematic manner.

3 Roles and Responsibilities

The University recognises its corporate responsibilities relating to information and records management.

3.1 The University Secretary has overall responsibility for, and ownership of, the Policy.

3.2 Members of the Executive are responsible for endorsing, implementing and supporting the Policy and any amendments.

3.3 Deans and Heads of Department are responsible for ensuring that their School/Department adopt and conform to this Policy.

3.4 The Head of Information Compliance, Governance is responsible for implementation and management of this Policy.

3.5 Other roles within the University support the management and security of information and records including archives, Information Services, IT security and physical security.

3.6 The Information Governance Committee, the Information Management Forum and Information Co-ordinators will have key information governance roles.

3.7 Individual members of staff are responsible for ensuring that they manage information and records in line with University policy and guidelines.

4 Information Governance

The University will establish information governance arrangements including:

- University Court approval of the Information Assurance Charter.
- Executive Board members holding responsibility for sound information and records management within their business areas.
- Information Governance Committee (IGC) to ensure a consistent approach to information governance and advise on information compliance issues.
- The network of local Information Co-ordinators, to support information management and compliance including access to information regimes, data protection and records management.

5 Information Governance Committee

The Information Assurance Charter sets out that the University will establish an Information Governance Committee (IGC) which will report to the Audit Committee. The IGC, in conjunction with the Information Management Forum, will ensure consistent information governance arrangements across the University and recommend action or policy to promote, improve and assure the efficient and safe processing of information. The terms of reference and composition of the IGC have been agreed by University Court.

6 Recordkeeping

6.1 The University will create, keep and manage appropriate records to meet its business needs and provide evidence of its activities. The University's records are created and received by staff, partners and contractors working on behalf of the University.

6.2 The authenticity, reliability, integrity and usability of records will be maintained and protected from creation until destruction or transfer to Archives.

6.3 Departments will have in place appropriate procedures to ensure the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records.

6.4 Documents and records, however captured and stored, will be recognised as a corporate resource and will be accessible to appropriate colleagues and external partners and stakeholders. To assist with this, systems will be developed to ensure that records can be located.

6.5 Records are subject to University policies concerning retention, destruction, access, security, sharing and publication.

7 Business continuity planning and Vital Records

7.1 The University has Vital Records which are essential to operation and which, if lost or destroyed, would seriously impair or disrupt business operation; might place the University in legal or fiscal jeopardy; or might jeopardise the rights of individuals.

7.2 The University has developed Vital Records Guidelines to outline responsibilities for identifying, managing and protecting Vital Records.

8 Retention and Disposal

8.1 The University will manage its records in line with the Records Retention Schedule to ensure that information is not retained for longer than required to meet business needs and legal and regulatory requirements. The Records Retention Schedule will be approved by the University Executive and will be reviewed on a biennial basis.

8.2 The Records Retention Schedule outlines the timescales for retaining records and the disposal action which may be destruction or long term preservation.

8.3 Systems will be put in place to review records to identify those which may be destroyed in line with the Records Retention Schedule.

8.4 Procedures will be implemented to prevent the premature destruction of records that need to be retained to satisfy legal, financial and other requirements of public administration.

8.5 The Information Owner will approve disposal and a record will be kept of the authorising officer and date of authorisation. A Destruction Certificate should be received to provide an audit for off-site and commercial destruction.

8.6 Records and data must be disposed of in a secure manner in line with the University's disposal policies including the Information Classification and Handling Policy.

9 Maintaining and accessing records over time

9.1 The University has a University Records Centre to store, manage and control inactive paper records.

9.2 Many of the University's records are held electronically and within business systems. To ensure that these records are accessible over time, managers and specialist staff will consider issues such as file format, software requirements and the technology required to access systems when implementing and developing systems.

9.3 Many Records exist in electronic format including emails which document business activities and transactions. Email records are legally admissible and will be managed like any other record.

Responsibilities associated with the use of email are outlined in the Information Systems Policy. The University will develop guidance on managing email and the use of personally owned devices for university purposes.

9.4 Procedures are required to demonstrate the authenticity and reliability of electronic records created by scanning paper records. The University will develop procedures and publish Scanning Guidelines.

10 Retaining Records for Permanent Preservation

10.1 The University will make arrangements for the maintenance and management of its inactive records.

10.2 Records may be designated as of enduring or long term value and suitable for maintenance in the University's Archive. Archival Records are those with enduring educational, cultural and historical value. The arrangements for archiving records will be set out in the Archiving and Transfer Arrangements Policy.

10.3 The Records Retention Schedule highlights the types of records likely to be of enduring value including:

- Essential records such as title deeds.
- Records which must be permanently preserved by law or regulation.
- Records of policies, structures and processes so that University activities may be understood by future generations.
- Records relating to major decisions, well-known public or international events, persons, or to major events which give rise to interest or controversy.
- Records containing matters of significant regional or local interest.
- Records relating to the origins and history of the University; its organisation and procedures; functions and dissolution.
- Copies of annual and other major University reports.

11 Transmission and Communication of Records

11.1 To ensure that adequate protection is in place the guidelines within the Information Classification and Handling Policy will be followed when sharing records within and outside the University.

11.2 Where information is shared with partners or others the Information Sharing and Data Processing Agreements must be in place and will outline the overarching principles and arrangements.

12 Access to information

The University will ensure that records are disclosed to individuals and organisations in compliance with the requirements of legislation including the Data Protection Act 2018, the EU General Data Protection Regulation, the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

13 Performance and monitoring

13.1 Compliance with recordkeeping standards is monitored externally by the Information Commissioner and the Office of the Scottish Information Commissioner.

13.2 Internal audit may carry out reviews relating to compliance with information and records management policies and guidelines.

Appendix A: Glossary

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| Archives | Records that are selected for permanent preservation as part of the University's corporate memory and for research purposes. |
| Destruction | Process of eliminating or deleting records, beyond possible reconstruction. |
| Disposal | The decision as to whether the record should be destroyed or transferred to an archive service for permanent preservation and putting into effect that decision. |
| In-active records | Records which are not referred to regularly but require to be retained for business or legal/regulatory reasons. |
| 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. |
| Records management | Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records. |