Lincoln Bishop University

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Document Administration

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**Please Note:* *This document remains valid until formally revoked or replaced by the University.*

VERSION CONTROL TABLE

Version Number	Date Authorised	Summary of Key Changes
1.0	7 October 2015	Policy first issued and approved by Senate, and delegated to University Executive Group
2.0	4 February 2025	Policy reviewed and amended to ensure alignment with current institutional processed and sector best-practice

DATA & INFORMATION (RECORDS) MANAGEMENT POLICY FRAMEWORK

1. INTRODUCTION

1.1. The purpose of this policy is to establish a framework for the management of records by all staff. The University recognises that keeping records is necessary in order to carry out its organisational functions and meet its compliance obligations.

1.2. A well framed and transparent records management function provides organisational benefits including:

1.2.1. Enhanced efficiency in conducting university business, teaching, and research due to streamlined access to relevant information.
1.2.2. Improved decision-making capabilities through easy identification and retrieval of necessary records.
1.2.3. Compliance with legal and regulatory obligations, reducing the risk of non-compliance penalties.
1.2.4. Effective governance facilitated by a clear understanding of processes, decisions, and actions.
1.2.5. Preservation of the university's corporate memory, preventing loss of valuable historical information.
1.2.6. Reduction in resource wastage, such as staff time and storage space, by eliminating unnecessary record duplication.
1.2.7. Protection against legal risks and litigation by maintaining accurate and accessible records.
1.2.8. Better use of physical and server space, allowing for a more organized and cost-effective storage system.

1.3. The purpose of this policy is as follows:

1.3.1. To outline a framework within which staff responsible for maintaining the University's records can develop policies and practices from which effective management can be achieved and audited.
1.3.2. To outline the importance of, and principles which underpin, good records management.
1.3.3. To make clear individual and institutional responsibilities with regard to records management at the University; and
1.3.4. To provide a basis from which the University's Records Retention Schedule can be understood and utilised.

1.4. The policy framework will be augmented through continuous review and guidelines in best practice. These will be developed by the Data Protection Officer in conjunction with key stakeholders and Groups across the University.

2. SCOPE

2.1. This policy applies to all University records, information and data, regardless of how they were created and how they are stored (for example, whether hard copy or digital; held by individuals or in centralised systems), and covers the entire life cycle of records, from creation through to disposal.

2.2. A record is defined as "recorded information, in any form, created or received and maintained by an organisation or person in the transaction of business or conduct of affairs and kept as evidence of such activity".

2.3. Records and documentation created in the course of research or a project, whether internally or externally-funded, are also subject to this policy. Where a project is externally funded (i.e. ERFD), specific retention rules of information may apply. In such cases, this information is subject to this policy in addition to those outlined by the contracted funding agency.

2.4. This policy applies to, and must be adhered to, by all staff creating and maintaining records as part of their work at the University.

2.5. A small percentage of the University's records are selected for permanent preservation as part of the institution's archives, both for the purposes of historical research and as an enduring record of the conduct of its business.

3. RESPONSIBILITIES

3.1. University Executive Group (UEG)

3.1.1. University Executive Group (UEG) is responsible for supporting and driving the broader information governance agenda at the University, as well as providing assurance that effective best practice mechanisms are in place across the University.

3.1.2. As such, within the context of records management, UEG is responsible for:

i. Approving the Data & Information (Records) Management Policy Framework;
ii. Reviewing and approving the University's strategic approach to records management and monitoring institutional compliance; and
iii. Ensuring the provision of necessary resources and systems required to enable strategic and effective records management

3.2. University Leadership Group (ULG)

3.2.1. University Leadership Group (ULG) members are responsible for ensuring that staff in their area are aware of this policy and their responsibilities.

3.2.2. ULG members are expected to encourage and promote a culture of good records management within their area of responsibility.

3.3. All Staff

3.3.1. All staff are responsible for familiarising themselves with this policy and must adhere to the policy and associated guidance ensuring that records for which they are responsible are accurate, and that they are maintained, stored and disposed of in accordance with the University's Records Retention Schedule.

3.4. In some circumstances, frameworks are overseen by a University Group to ensure their effective development and implementation of policies, procedures and practices across the University.

4. POLICY

4.1. Importance of Good Records Management

4.1.1. Good records management is crucial to the effective running of the University. Without it, the University is likely to waste time and resources and risks reputational damage and non-compliance with important legislative and regulatory requirements.

4.1.2. Good Records Management ensures that:

i. Information can be found easily when needed and increases the University's efficiency and accountability;

ii. The University can be confident that records are an authoritative source of information and provide a solid basis for decision-making, policy development, and service provision;

iii. Legal and regulatory compliance obligations can be met and to enable the University to comply with the commitments of the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPIA 2018) and Freedom of Information Act (FOIA 2000); and

iv. Information is protected appropriately.

4.1.3. To ensure that good records management is maintained, the principles outlined in this policy should be adhered to, and records should be managed in accordance with these throughout their entire life cycle, from creation to disposal.

4.2. Records Management Principles

4.2.1. Records should always be kept:

i. Where they are needed for institutional business or regulatory and legal compliance purposes, to demonstrate accountability, or to protect the rights of the institution and its staff, students and stakeholders;
ii. To clearly articulate how things are done and what has happened, and to provide reliable evidence and justification relating to decision making processes; and
iii. Where they enable staff to work efficiently and provide details of relevant processes and necessary information required for individuals to carry out the requirements of their roles.

4.2.2. Where records are used by multiple teams, there should always be a clear understanding of which area or role has ultimate responsibility for the maintenance of the record.

4.2.3. Records should be created and maintained with appropriate security measures and access controls in place, based on the content and value of the records and any applicable legislative or regulatory requirements (e.g. data protection).

4.2.4. There should be knowledge of where records are held and how to access them; appropriate storage and filing systems should be used to meet operational needs and to enable records to be retrieved and used by everyone who needs them. Where applicable, it should be clear how records are connected to other records.

4.2.5. Where information is held within a managed group i.e. Committee, Department, Working Group or Project Group, where this group is closed the appropriate member of the group is responsible for ensuring the effective archiving or distribution of the information to ensure knowledge and records are retained.

4.2.6. Where possible, records should be complete and it should be evident when they have last been accessed, used, and/or modified.

4.2.7. Records should only be kept for as long as they are required, but they should remain useable and accessible for as long as they are required.

4.2.8. Plans should be in place to protect the most business-critical records and mitigate against risk of loss, and records should be created and maintained in such a way as to ensure business continuity in the event of staff or system changes.

4.3. 'Master Records'/Retention Schedule

4.3.1. Whilst this policy and the records management principles apply to all University records, the University also publishes additional guidance for use alongside this policy which applies specifically to the University's 'master records,' known as a Master Policy Library, in particular the process for the creation and updating of Master Policy documents.

4.3.2. The Master Policy Library is overseen by the Vice-Chancellor’s Office with the support of other departments to ensure records are effectively maintained. This is located on the University intranet.

4.3.3. A master record, for the purposes of this policy and associated guidance, can be understood as a core University record which has ongoing institutional, authoritative and/or evidential value (for example, a final published version of a policy, but not the working drafts; or audited Financial Statements).

4.3.4. The JISC document Record Retention Schedule for Higher Education Institutions provides guidance on recommended retention periods for types of records commonly produced by HEIs and is the document upon which the University's Record Retention Scheduled and associated guidance is based.

4.4. Disposal

4.4.1. Records should be disposed of when no longer needed to meet current organisational needs or legal and compliance obligations.

4.4.2. Disposal refers to the decision about whether a record is destroyed, the archive review process is initiated, or the record is transferred to University's archive.

4.4.3. Where destruction is the decision, the same security considerations that apply to the creation and maintenance of records should also be applied to the destruction process (e.g. confidential or sensitive records should be destroyed securely). Guidance on the correct way of disposal can be found on the Staff Portal.

4.4.4. If routine destruction of records is required, this should be built into systems wherever possible.

5. LEGISLATION, GOOD PRACTICE & GUIDANCE

5.1. This policy framework is underpinned by a range of legislation, statutory, regulatory or administrative codes of practice. They form the basis of frameworks, processes and procedures that are used to inform, guide and develop record keeping activities within the University.

5.2. The most important are:

- 5.2.1. The Data Protection Act 2018 and the UK-General Data Protection Regulation (UK GDPR)
- 5.2.2. Freedom of Information Act 2000
- 5.2.3. Code of Practice on the Management of Records issued under section 46 of the Freedom of Information Act 2000
- 5.2.4. ISO BS 15489-1: 2016 – Information and documentation – Records management Part 1: Concepts and principles
- 5.2.5. BS 10025:2021 – Management of records – code of practice
- 5.2.6. Statutory and regulatory guidance relates to a wide range of functions and activities undertaken at the University. The aim is to engage with departments to ensure that they understand and are accountable and responsible for implementing requirements set out within such guidance as it pertains to their particular areas of activity
- 5.2.7. National Archives Records Management Guidance
- 5.2.8. JISC records management guide

5.3. If you require support or guidance on any aspect of good records management, please contact the Data Protection Officer.

6. RELATED INTERNAL POLICIES, PROCEDURES, AND GUIDANCE

6.1. Records Retention Schedule

6.2. Data Protection Policy

6.3. Privacy Policy

6.4. Data Breach Policy

6.5. Freedom of Information Policy

6.6. Subject Access Request Policy

6.7. Master Record Creation & Update Procedure