Records & Information Management Policy

University College of Osteopathy

Core Documentation Cover Page					
Records & Information Management Policy					
Version number	**Dates produced and approved (include committee)**	**Reason for production/ revision**	**Author**	**Location(s)**	**Proposed next review date and approval required**
V1.0	Aug 2018 SMT	New policy to ensure that the UCO creates, maintains, retains and properly disposes of records in line with legislative requirements.	Data Protection & Freedom of Information Officer	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	Aug 2020 (Or in response to legislation changes)
Equality Impact					
Positive equality impact (i.e. the policy/procedure/guideline significantly reduces inequalities)					
Neutral equality impact (i.e. no significant effect)					X
Negative equality impact (i.e. increasing inequalities)					
If you have any feedback or suggestions for enhancing this policy, please email your comments to: quality@uco.ac.uk					

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Records & Information Management Policy

1. INTRODUCTION

1.1 Records and information that the University College of Osteopathy (UCO) creates and processes is a fundamental asset and therefore requires effective and appropriate management for:

- Effective and efficient administration.

- Discharging UCO responsibilities and business.

- Compliance with legislative requirements.

1.2 Good records management also enables staff to discharge their duties by improving organisation of and access to relevant records, removing out of date or superseded records and reducing duplication of documents and data.

1.3 The Records Management British Standard BS ISO 15489 defines 'records' as "*Information created, received and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business*". Subsequently UCO records are defined as those documents or data sets which are produced or created from or facilitate the business carried out by the UCO and which provide evidence of its transactions or activities.

2. SCOPE

2.1 This policy is applicable to:

- All UCO staff (including voluntary, casual or agency workers) and students handling records produced as a legal obligation or transaction of business.

- All records created and held by the UCO, both paper and digital, (including email and information held in databases).

- All UCO records accessed whether accessed on- or off-site.

3. PURPOSE

3.1 The purpose of this policy is to ensure that the UCO creates, maintains, retains and properly disposes of records required for the conduct of its business and that they are managed in line with legislative requirements which include:

- General Data Protection Regulations (GDPR)

- Data Protection Act 2018

- Freedom of Information Act 2000

- Environmental Information Regulations 2004

- Limitation Act 2008

- British Standard for Records Management (BS ISO 15489-1:2001)

- The Lord Chancellor's Code of Practice on the Management of Records

3.2   Good records management is important for a number of reasons as outlined in the Lord Chancellor's Code of Practice on the Management of Records as follows:

- It supports an authority's business and discharge of its functions, promotes business efficiency and underpins service delivery by ensuring that authoritative information about past activities can be retrieved, used and relied upon in current business;

- It supports compliance with other legislation which requires records and information to be kept, controlled and accessible, such as the Data Protection Act 1998, employment legislation and health and safety legislation;

- It improves accountability, enabling compliance with legislation and other rules and requirements to be demonstrated to those with a right to audit or otherwise investigate the organisation and its actions;

- It enables protection of the rights and interests of an authority, its staff and its stakeholders;

- It increases efficiency and cost-effectiveness by ensuring that records are disposed of when no longer needed. This enables more effective use of resources, for example space within buildings and information systems, and saves staff time searching for information that may not be there;

- It provides institutional memory.

4. RELATIONSHIP TO OTHER UCO POLICIES

4.1   This policy should be used in conjunction with the following other UCO policies:

- Data Protection Policy & Code of Practice

- Freedom of Information Policy

- Records & Information Retention Schedule (RIRS)

- Information Security Policy

- Version Control Policy

5. ORGANISATIONAL ARRANGEMENTS TO SUPPORT RECORDS MANAGEMENT

5.1 AS A CORPORATE FUNCTION

5.1.1   The UCO has a corporate responsibility to maintain its records and records management systems in accordance with legislation and good practice. In this context, this policy includes records in all formats throughout their lifecycle, from planning, to creation, to disposal.

5.2 AS A CORPORATE RISK

5.2.1   The UCO's records are considered a corporate asset and as such their loss may cause significant disruption to business and, if stolen or compromised, financial and reputational damage. Records Management is therefore included on the UCO's Risk Register to ensure that appropriate mitigating action to minimise risk of their loss is considered and implemented.

5.3 RESPONSIBILITIES FOR RECORDS MANAGEMENT

5.3.1   Recognising the corporate function of records management, the Senior Management Team shall be responsible for approving this policy.

5.3.2 The Information Governance & Security Committee (ISGC) shall be responsible for reviewing and monitoring the implementation of this policy on behalf of the Senior Management Team (SMT) and the Board of Directors.

5.3.3 The Data Protection & Freedom of Information Officer (DPFIO) shall be responsible for the operational implementation of this policy and for working with staff to ensure that they are aware of their records management responsibilities.

5.3.4 All staff, students and other stakeholders shall be responsible for complying with this policy for UCO records that they handle and for consulting the DPFIO if they require assistance to do so.

6. RECORDS MANAGEMENT POLICY IMPLEMENTATION

6.1 POLICY COMPLIANCE

6.1.1 Senior Managers will implement practices to ensure compliance with this policy within their individual areas, and review them regularly to ensure that these are effective and that all staff are aware of them.

6.1.2 Ensuring that the guidance below is followed will help staff to avoid any data protection concerns and help facilitate responses to freedom of information and subject access requests.

6.2 CREATING RECORDS

6.2.1 Records should only be created where necessary, and duplication should be avoided where possible.

6.2.2 Staff are expected to:

a) Use the Records & Information Retention Schedule (RIRS) to determine how long a file needs to be kept for at the time of creation and ensure that the file is named (see Naming Files & Folders) and will be reviewed in a timely manner to comply with this.

b) Use the UCO Communications Guide to create formal records to ensure that they reflect the correct logo and font which shall identify them as authentic UCO documents.

c) Use the UCO's Version Control Policy to clearly indicate whether a file is a draft or an approved version.

6.3 NAMING FILES & FOLDERS

6.3.1 Staff are expected to:

a) Keep file and folder names short, but meaningful so that they clearly reflect their contents and can easily be retrieved.

b) If appropriate, use abbreviations or other terminology that is specific to their area making sure those accessing the files will understand the abbreviations/ terminology, e.g. by committee reference.

c) Where possible, files and folders should be named using the date at the beginning of the file / folder name as follows to ensure that files are sorted according to the date they were created and therefore are easier to locate and dispose of according to the RIRS.

d) Avoid using words such as 'draft' or 'letter' at the start of file names, unless doing so will make it easier to retrieve the record, i.e. all records with file names starting "Draft" will be listed together and may be unrelated. When retrieving files it will be more useful to find a file next to a relating one, rather than next to an unrelated draft record.

e) Make sure old titles of paper folders are completely erased if these are re-used to store paper files.

f) Name files in the following format where appropriate: Year-Month-Date-Content-Version-AGREED/DRAFT

e.g. 2018-04-01-SMTMinutes-V1.0-AGREED (for the agreed first version of minutes of the SMT meeting on the 1st Apr 2018).

6.4 FILING RECORDS

6.4.1 Records should be arranged in a consistent and logical way using the above naming system so that they can be easily located and retrieved. When setting up a filing system staff should consider the following:

- How will it help you to carry out your work most easily and efficiently?

- Will others be able to easily locate and access your files if you are absent?

- Can your files be arranged to ensure that you are only keeping files for as long as necessary?

6.4.2 Staff are expected to:

a) Keep their filing system consistent and simple and avoid long, complicated numbering or coding that may be easy to misfile or misunderstood by others.

b) Make sure everyone using it knows how it works, and that new members of staff are trained.

c) Balance ease of access for staff with appropriate security arrangements such as computer passwords, encrypted filed or locked filing cabinets etc.

d) Encourage individuals to follow the same filing structures in their own personal workspace.

e) Ensure that file titles are easily visible and understandable.

6.5 GOOD HOUSEKEEPING

6.5.1 It is the responsibility of the information owner / author to ensure that good housekeeping practices are undertaken to ensure the accuracy and relevance of information assets that reside on the UCO's network.

6.5.2 Any personal or residual information or data that has no value or is no longer required for UCO purposes should be removed from the relevant drives and servers on a regular basis, at least annually.

6.6 RETENTION & DISPOSAL OF RECORDS

6.6.1 Records should be retained and disposed of in line with the UCO's Records & Information Retention Schedule (RIRS). The RIRS provides a list of the records produced by the UCO by department or business area and details the length of time that they should be retained for to meet operational, regulatory and legal requirements. It also assigns staff responsibilities for the management of records, and provides the rationale for the recommended time periods, with details of any legislative or archival value considerations.

6.6.2 The disposal of paper records, if confidential, must be shredded with a cross-cut shredder or disposed of using the confidential waste bin provided in line with the RIRS.

6.6.3 Electronic records should be deleted, ensuring that all versions and copies are included in line with the RIRS.

7. ARCHIVING RECORDS

7.1 ALL RECORDS

7.1.1 All archived records should be clearly labelled by date and contents and easily located to enable requests for information to be fulfilled efficiently and effectively.

7.2 PAPER RECORDS

7.2.1 Archived paper records shall be placed into archive boxes clearly stating their contents and destruction date and method using the Certificate of Destruction Form (Appendix 1).

7.2.2 A copy of the Certificate of Destruction shall be kept by the Head of Department who shall be responsible for ensuring that the contents of archive boxes is destroyed in accordance with the destruction date.

7.3 ELECTRONIC RECORDS

7.3.1 Archived electronic records shall be placed into a folder labelled as such with their contents and destruction date clearly stated.

7.3.2 Heads of Department / Senior Managers shall be responsible for ensuring that electronic files used within their teams are archived in line with this policy and deleted in accordance with their destruction date.

7.3.3 The Information Governance & Security Steering Group shall review and undertake audits to ensure that this is being maintained.

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APPENDIX 1: CERTIFICATE OF DESTRUCTION FORM

IMPORTANT!
This form must be kept for X years after the archive box destruction date along with the archive box contents inventory (Appendix 2).

This is to certify that the disposal/destruction of the following records was carried out in compliance with the University College of Osteopathy's Records & Information Retention Schedule by means of an approved method of destruction.

Department:	
Authorisation Name:	
Authorisation Date:	
Destroyed by Name:	
Destruction Date:	

Box Number	**Description of Destruction** (e.g. Confidential Waste / Shredded, etc.)