

## Records Management Policy

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### 1. Overall Commitment

- The University recognises the importance of creating, capturing and managing complete and accurate records to support its functions and activities. These assist in supporting the delivery of the University Vision and Strategic Plan and provide a range of other benefits, including:-
  - Supporting effective and informed policy formation and decision-making
  - Improving transparency and accountability
  - Managing business risk and business continuity
  - The protection of rights and obligations for the University and its community
  - Protection and support in litigation
  - Compliance with legislation and regulations
  - The demonstration of good corporate governance and responsibility
  - The protection of intellectual property
  - The protection of corporate, personal and collective memory

### 2. Principles

- The University aims to follow British Standard 10025:2021 and the good practice principles it sets out for the management of records<sup>1</sup>. In particular it will aim to ensure that there are appropriate processes and procedures covering the following areas:-
  - **Establishing and maintaining a management framework** - ensuring direction and support for the management of records from senior management, and organisational arrangements in place to support the management of records.

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<sup>1</sup> British Standard 10025:2021. Management of records - code of practice: Principles of good practice for the management of records, p. 5

- **Identifying, creating and capturing records to meet the University's requirements** - identifying, creating and capturing records needed to meet legal, regulatory and business requirements.
  - **Organising and building frameworks for the effective retrieval and processing** - capturing and organising records such that they can be retrieved and processed for as long as they are retained, and that the University knows what records it holds.
  - **Processing and storing records** - maintaining the integrity of records during processing and storage, keeping them accessible, retrievable and readable.
  - **Managing security and controlling access** - have measures in place to protect records from accidental, unauthorised or unlawful access, disclosure, alteration, copying, theft, loss or destruction.
  - **Managing retention and organising disposal** - retaining records in line with rights and requirements; identifying and preserving records of continuing value; regularly, systematically and securely destroying other records.
  - **Establishing and maintaining arrangements with other organisations** - having arrangements in place so that records shared with, or created, captured, processed or stored by, other organisations are managed to agreed standards.
  - **Monitoring and reporting on the management of records** - monitoring and measuring performance and assessing and reporting on the overall effectiveness of the management of the organisation's records.
- Records created and retained in record keeping systems should possess the following characteristics<sup>2</sup>:-
    - **Authenticity** - An authentic record is one that can be proven to be what it purports to be, to have been created or sent by the person purported to have created or sent them, and to have been created or sent at the time purported.
    - **Reliability** - The contents of a record should be trusted as a full and accurate representation of the activities or transactions to which they relate. Records must be sufficient in content, context and structure to reconstruct the relevant activities and transactions that produced it.
    - **Integrity** - The integrity refers to it being complete and unaltered. A record should be protected against unauthorised alteration. Any authorised annotation, addition or deletion to a record should be explicitly indicated and traceable.
    - **Useability** - A useable record is one that can be located, retrieved, presented and interpreted. A useable record should be connected to the business process or transaction that produced it.
  - The University aims to develop processes and procedures that will embed the above principles and characteristics into system design and workplace activities and workflows.
  - Record keeping systems should be<sup>3</sup>:-
    - **Reliable** - They must routinely capture all records within the scope of the business activity they cover. They must routinely function as the primary source of information regarding actions documented in the records.

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<sup>2</sup> BS ISO 15489-1:2016. Information and documentation - records management part 1 concepts and principles, p. 4

<sup>3</sup> Ibid p. 6

- **Secure** - They must be securely maintained to prevent unauthorised access, alteration, damage or removal. They must be stored in a secure environment, the degree of security reflecting the sensitivity and importance of the contents. Where records are migrated across changes in technology, the University must ensure that the evidence preserved remains authentic and accurate.
- **Compliant** - Meet all requirements arising from current business and stakeholder expectations and the regulatory environment in which the University operates. Systems can be assessed for their compliance with respect to these requirements as part of the maintenance and improvement processes and they ensure organisational accountability, good governance and risk management.
- **Comprehensive** - Comprehensive records systems should be capable of managing all required records of the range of business activities to which they relate
- **Systematic** - Records systems should be designed to automate records processes as much as is practicable through their design and routine application of authorised policies and procedures.

### 3. Definitions and scope

- Records are defined as *information created, received and maintained as evidence and as an asset by an organisation or person, in pursuit of legal obligations or in the transaction of business.*<sup>4</sup> For the purposes of this policy records is used as a collective term that encompasses data, documents, information or records.
- Records Management is defined as *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>5</sup>
- The policy applies to records held by, or on behalf of, the University relating to the functions, activities and transactions it undertakes.
- The policy applies to records in any format and within any systems that are under the management of the University. Systems may be physically within the University or they may be hosted by third parties and retained external to the University's physical estate.
- The policy applies to members of staff who create and manage records as well as other stakeholders who may have access to, or interact with University records or data. The University would expect these stakeholders to adhere to the principles and statements set out in the policy.

### 4. Governance and responsibilities framework

- The University has an information governance framework setting out roles, responsibilities and accountabilities for the management of information. The main roles, responsibilities and accountabilities are set out within the [Information Principles](#) adopted by the University.

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<sup>4</sup> BS ISO 15489-1:2016. Information and documentation - records management, part 1: Concepts and principles, p. 2.

<sup>5</sup> Ibid p. 3.

- Records Management as a function is governed by and reports to a sub-group of the University Executive Board, the Information Management and Security Group (IM&SG). Its terms of reference are available [here](#).
- The University Library is responsible for providing the records management function for the University of Sheffield.
- The Director of Library Services & University Librarian has overall accountability and ownership of the Records Management Service (RMS) at the University.
- The role of Head of Records Management is responsible and accountable for defining the framework of principles, policies, processes and procedures relating to records management within the University. The role is also responsible for developing the framework to assess maturity and assurance. This also includes identifying and highlighting areas of concern or risk. The role reports to the University Librarian on matters of operational activity and reports to IM&SG on institutional maturity, assurance and concerns or risks.
- Other roles within the University carry responsibility and accountability for the management of information, data and records. They include the University Data Protection Office (Data Protection Officer), Senior Information Risk Owner and Chief Information Security Officer. Their roles and their relationship to information governance and management are set out in the Information Management documentation above.
- The Records Management Service (RMS) is responsible for implementing a framework of activities that develop and improve records management practices. This involves working with departments to implement processes and procedures that support the principles outlined above.
- The RMS is responsible for the operation of the University records centre and its associated activities.
- Information Management guidance has identified relevant [roles and responsibilities](#) that all staff at the University have in relation to information management and record keeping.

## 5. Relationship with other frameworks and activities supporting Information Management

- This policy exists within a wider framework of other functions that support information management work at the University. These include Data Protection, Information Security, Research Data Management, Data Governance and Digital Preservation. There are often complementary and interdependent areas of activity between these functions.
- The development of a suite of guidance to support information management, including [principles, guidelines and roles and responsibilities](#) brings together areas of mutual interest that align to and support this policy.
- Departments can use the [Records Management assessment framework](#) to document their maturity and identify areas for improvement.
- The RMS is responsible for the following ancillary documentation that supports implementation of this policy:-
  - [Records Retention Schedule](#) (RRS) - a document that sets out how long different types of records should be retained for. Specific requirements for retention and disposal should be added to Information Asset Registers and embedded into system design and processes for managing assets and information. Departments will be expected to apply appropriate retention and disposal to locally held assets, under the guidance of the RMS.

- The Information Asset Register (IAR) - a document that sets out the different types of information assets held and associated information necessary for managing assets documented. Departments are expected to keep and maintain an IAR in order to manage their information assets.
- [Information Classification Scheme](#) - a schema that defines the sensitivity of information held by the University. Departments are expected to be aware of, and apply the scheme, under the guidance of the RMS.
- [Records Management assessment framework](#) - All departments require their own local records management processes and procedures to support a well managed, effective and efficient delivery of their activities. The assessment framework allows departments to document their maturity and identify areas for improvement against a set of good practice statements. All departments are expected to utilise the Records Management assessment framework to improve internal systems, processes and procedures relating to records management. The RMS is responsible for ensuring departments understand the framework and use it appropriately to develop and improve departmental records management maturity.
- Records Management also operates the University Records Centre. It provides a secure storage and retrieval service for University records held in hard copy format.

## 6. Legislation, regulations and standards

- This policy is underpinned by a range of legislation, statutory, regulatory or administrative codes of practice and internationally recognised standards. They form the basis of frameworks, processes and procedures that are used to inform, guide and develop record keeping activities within the University.
- The most important are:-
  - The Data Protection Act 2018 and the UK-General Data Protection Regulation (UK GDPR)
  - Freedom of Information Act 2000
  - Code of Practice on the Management of Records issued under section 46 the Freedom of Information Act 2000
  - ISO BS 15489-1: 2016 - Information and documentation — Records management Part 1: Concepts and principles
  - BS 10025:2021 - Management of records - code of practice
- 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.
- There are many international standards and technical reports relating to records and information management, as well guidance documentation developed by subject matter experts. This is used to develop the operational frameworks, activities, processes and procedures that the University should follow in order to support the principles set out in this policy.

## 7. Monitoring and compliance

- Monitoring and compliance will take various forms. The first line of monitoring and compliance will be undertaken by departments themselves. They are best placed to monitor their own policies, processes and procedures and assess compliance against University requirements, good practice statements and the principles set out in this

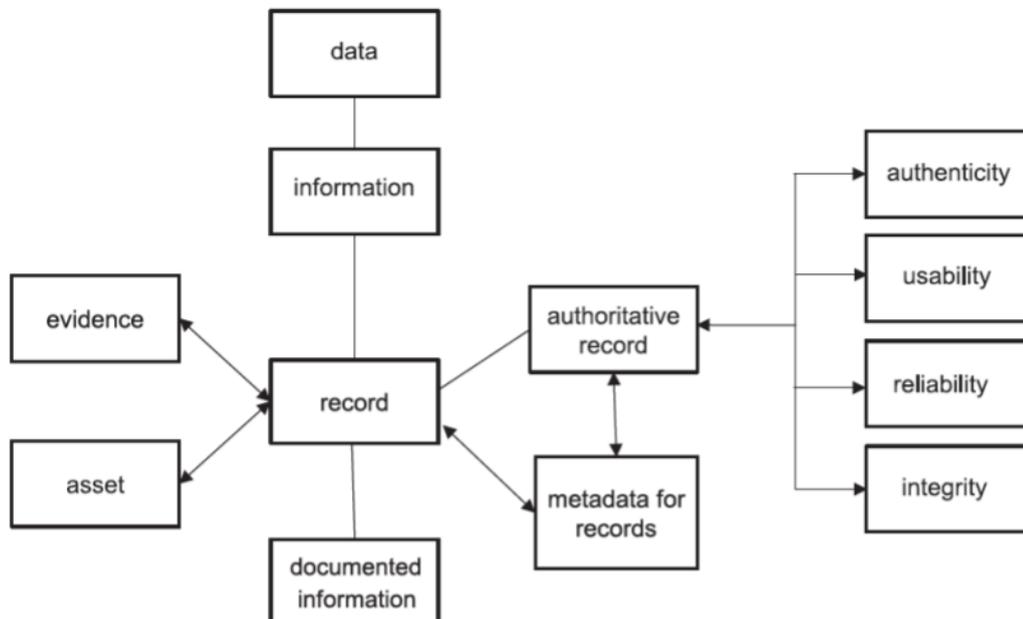
policy. The RMS will provide the second line of monitoring to ensure compliance against good practice and principles by working with the departments to assess activities and providing assistance, support and commentary where necessary. A third line of monitoring may be utilised by the use of internal audit, or even external bodies, such as regulators, if necessary.

- The RMS is responsible for reporting activities to the UEB IM&SG to provide assurance and evidence of maturity.
- The RMS is responsible for providing an assessment to HoDs on maturity of their departments records management activities on an annual basis.
- Should significant concerns or issues be highlighted or expressed the RMS will also be able to escalate as appropriate through the IM&SG.

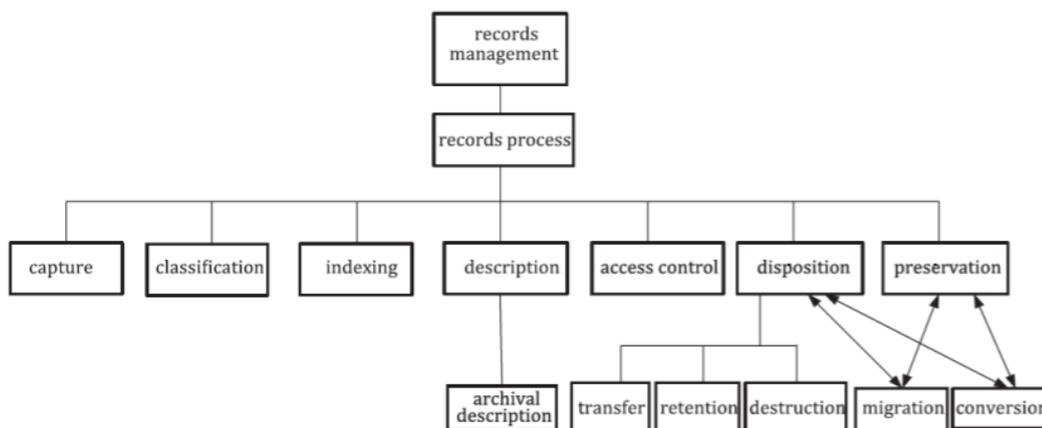
## 8. Document control

<b>Document type</b>	Records Management Policy
<b>Approved by</b>	Information Management and Security Group
<b>Change manager</b>	University Records Manager
<b>Document status</b>	Policy
<b>Version</b>	v3.0
<b>Date of publication</b>	September 2023
<b>Next review date</b>	Formal review September 2028
<b>Summary</b>	The policy sets out the University's approach to the management of University records.
<b>Scope</b>	The policy applies to records and data created and held by the University of Sheffield
<b>Revision history</b>	July 2023 - full review of content to take into account organisational changes and additional external documentation, in particular the 2021 British Standard Code of Practice on management of records.

## Appendix one - core concepts relating to records<sup>6</sup>



## Appendix two - core concepts relating to records management and process<sup>7</sup>



<sup>6</sup> BS ISO 30300:2020. Information and documentation - Records management — Core concepts and vocabulary p. 13.

<sup>7</sup> Ibid p. 14.