



**Document Control Table**

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| <b>Author(s) (name, job title and Division):</b> | Sarah Phillips, Archivist & Records Manager, University Library Service |
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**Document History**

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|----------------|---------------|---|---------------------------------|
| V 1.3          |               | Sarah Phillips, University Records Manager  | Amended name of Records Manager |
| V 1.4          | March 2015    | Sian Collins, University Records Manager    | Full review, wholesale changes  |
| V1.5           | April 2015    | Sian Collins, University Records Manager    | Minor amendments                |
| V1.6           | May 2015      | R Robertson, Deputy Director, GOVRN         | Further amendments              |
| V2.1           | November 2016 | Sian Collins, University Records Manager    | Reviewed, no amendments         |
| V3             | May 2019      | Sarah Phillips, Archivist & Records Manager | Full review, wholesale changes  |

# RECORDS MANAGEMENT POLICY

## 1. PURPOSE STATEMENT

Cardiff University recognises that its records are a vital source of evidence and information which support its endeavours to become a world-leading, research-excellent, educationally outstanding university.

The purpose of this policy is to ensure that the University's records:

- are authentic, trustworthy and of good quality – containing sufficient, accurate and reliable information to meet its needs;
- can be easily found, accessed and understood by those who need them;
- are managed in an efficient and cost-effective manner.

It also ensures that the University's record keeping practices comply with legal and regulatory requirements including Data Protection Act 2018.

## 2. SCOPE

This policy applies to all records created, captured, maintained, used or destroyed by Cardiff University in the course of its core activities of research, learning and teaching; and all supporting activities which it undertakes.

Records are defined as documents, information or data created, received and maintained as evidence and as an asset by the University in pursuit of its legal obligations or in the transaction of its activities<sup>1</sup>.

All records, regardless of their form or the system in which they are captured, created or maintained are covered by this policy. This includes records held in digital and paper form.

Cardiff University's records are owned by Cardiff University.

## 3. RELATIONSHIP WITH EXISTING POLICIES

This policy forms part of the Information Security Management Framework. It should be read in conjunction with the Information Security Policy and the Information Classification & Handling Policy. It also has a relationship with other University policies specifically:

- Data Protection Policy
- Confidentiality Policy
- Intellectual Property Policy
- Research Integrity & Governance Code of Practice
- Institutional Archive Acquisition Policy
- F-SOP for Archiving records from Clinical Trials of Investigational Medicinal Products.

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<sup>1</sup> ISO 15489-1:2016

## 4. RESPONSIBILITIES

### **All persons engaged in University business**

All persons engaged in University business - including all staff, casual staff, postgraduate researchers, secondees, agency workers, contractors, suppliers, partners, external researchers, visitors, honorary staff, CUROP & CUSEIP students<sup>2</sup> and individuals undertaking volunteering or work experience - are required to adhere to this policy when creating, maintaining, using or disposing of records.

### **Data Leads (Professional Services Directors)<sup>3</sup>**

Data leads are responsible for ensuring that records created, captured and maintained by their domain are fit for purpose, of sufficient quality and have sufficient integrity to meet the University's operational and strategic needs.

### **System Owners (Business and Technical)<sup>4</sup>**

System owners are responsible for ensuring that systems are designed and maintained to manage records captured, created or maintained within the system in line with University policy and continue to meet the University's requirements for evidence and information.

System owners are required to provide appropriate guidance and training for system users to enable use that adheres to this policy.

### **Heads of School/Research Institute/Department/College**

Heads of School/Research Institute/Department/College are responsible for ensuring that records management within their area is in line with University policy, guidelines and procedures and that all persons engaged in University business receive training and guidance as appropriate.

### **University**

The University has corporate responsibility for maintaining its records and recordkeeping systems in accordance with its business, legal and regulatory requirements.

### **Senior Information Risk Owner**

The Senior Information Risk Owner has overall responsibility for ensuring that the University meets its responsibilities under this policy and in relation to legal and regulatory recordkeeping requirements. The Senior Information Risk Owner owns any risks associated with the University's recordkeeping practices.

On behalf of the Senior Information Risk Owner, the Director of Academic & Student Support Services shall ensure that the University has a records management policy and strategy and that these are regularly reviewed and compliance monitored.

### **University Library Service**

The University Library Service is responsible for employing a professionally qualified Archivist & Records Manager for the University.

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<sup>2</sup> Cardiff Undergraduate Research Opportunities Programme and Cardiff University Student Education Innovation Projects students

<sup>3</sup> For definition of Data Lead see [Information Security Policy](#)

<sup>4</sup> For definition of System Owner see [Information Security Policy](#)

The appointment and or delegation of an individual(s) responsible for archiving records of clinical trials of investigational medicinal products will be conducted in line with the University and Centre for Trials Research's standard operating procedures.

#### **Archivist & Records Manager**

The Archivist & Records Manager is responsible for providing and regularly reviewing policy and procedures for management of University records, including a records retention schedule.

The Archivist & Records Manager is also responsible for promoting compliance with records management policy and procedures; and providing advice, training and guidance concerning their implementation including advice on the establishment of records systems or controls.

The Archivist & Records Manager is responsible for managing the off-site storage service for semi-current records and overseeing the contract to ensure that it remains fit for purpose.

## **4. POLICY STATEMENT**

### **4.1 Record Capture/Creation**

- Records must be captured or created, with relevant content, sufficient contextual information, integrity and authenticity to meet the University's needs for evidence and information, particularly where there are external legal or regulatory requirements.
- Records must be created or captured in a durable form that will enable their accessibility to the University for the full length of their retention period.
- Where records created or captured contain personal information this information must be relevant to their purpose and not excessive.
- Where the University's processes are changed, or new processes established, due consideration must be given to the University's evidential and informational requirements. Records must be created or captured and maintained accordingly.
- All persons engaged in University business are strongly encouraged to follow the University's file naming principles and version control procedures<sup>5</sup>.

### **4.2 Records Maintenance**

- Records must be categorised, handled and stored in accordance with the University Information Classification and Handling Policy.
- Suitable controls or record systems should be in place to protect the authenticity, reliability, integrity and usability of records to ensure that the University's evidential and information needs are met. These controls may include protection from unauthorised access or alteration; back up regimes and business classification schemes.
- To enable knowledge sharing, business continuity and collaboration, records should be accessible to those who require access (whilst complying with the information classification and handling policy).

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<sup>5</sup>[Guide to naming electronic records](#) & [Guidance on Version Control](#)

- Storage locations for C1 and C2 records must be in line with the Information Classification and Handling Policy and protect records from unauthorised access, change, loss or destruction.
- Records must be maintained to ensure accessibility and usability for as long as required, this may require the migration of records to newer formats or systems. Where migration is carried out, sufficient safeguards must be taken and documented to ensure authenticity, reliability and integrity of the records are maintained.

#### **4.3 Records Retention**

- Records must be retained in line with the University records retention schedule including information contained within 'line of business' systems.
- The University's records retention schedule ensures that records are retained for no longer than is necessary for the University's business needs, except where records are selected for permanent preservation and transferred in line with the Institutional Archive Acquisition Policy.
- Personal information must not be kept for longer than necessary, unless relevant exemptions have been identified and applied (e.g. scientific or historical research purposes, statistical purposes, or for archiving in the public interest).

#### **4.4 Records Disposition**

- Records must be destroyed in line with the with the University records retention schedule.
- C1 and C2 records must be destroyed confidentially and in line with the University Information Classification & Handling Policy.
- As good practice destruction of records should be authorised by the appropriate manager and documented.
- Where records are scheduled for destruction, but, are subject to a Freedom of Information or Environmental Information request destruction will be delayed until the request has been concluded.

### **5. COMPLIANCE**

Breaches of this policy shall be reported to the IT Services Desk and dealt with under the Information Security Incident Management Procedure. A breach of this policy may be considered a disciplinary matter and addressed under the relevant disciplinary code.

Compliance with this policy should form part of any contract with a third party that may involve access to University's records. Failure by contractors to comply with this policy may constitute an actionable breach of contract.