

ISC13D005

Title: *Records management update*
Author: Raymond Scott (ISD)
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Issue

An update on the progress of establishing Records Management best practice at the institution.

Recommendation

Recipients are invited to consider the report and approve the proposal that records management is managed as business as usual within departments.

Resource Implications

Records Management is being resourced from within existing budgets.

Risk Implications

The risks associated with not doing records management were discussed in the original proposal considered at the June 2011 ISSC meeting.

Equality and Diversity

The proposals are not expected to impact on groups with protected characteristics, and no adverse impact has been identified.

Timing of decisions

Not applicable.

Further Information

- Raymond Scott (ISD), x3561, r.scott@uea.ac.uk
- The University Records Management policy is available at <http://www.uea.ac.uk/is/strategies/infregs/recordsmanagement>.
- Progress on the development of department records retention schedules is being reported at <https://intranet.uea.ac.uk/is/strategies/infregs/Records+management/RM+Contacts>

Background

The University has a Records Management policy¹, originally released in June 2010 and revised and approved by the ISSC at their meeting on 11 June 2013. Work on implemented the policy was also driven by the commitment made by the Vice Chancellor on 10 December 2010 in the ICO undertaking which stated:

“(3) The importance of good records management is embedded into the University’s information management processes, procedures and culture;”

An implementation plan was agreed in November 2011, and since then work has been undertaken in every department to establish records management.

Previous updates to ISSC (in November 2012, February 2013, and June 2013) have reported on the progress towards completing a full set of records retention schedules for all departments. While the majority of departments have got something in place, others, for a variety of reasons, have been slower to complete a data audit and develop and sign off retention schedules.

Update

At the time of writing, there are 28 complete RRSs. RRSs are outstanding from just four departments: ARM (part), DOS, PLN (part), and SCI (Faculty). A number of these are in advanced stages of development, but have not yet been completed and signed off.

The next step in the development of RRSs was to conduct a check against all completed RRSs and to make comparisons across similar record types and seek a consistent approach.

The 27 completed RRSs were scrutinized. (EST have matured a different approach to managing their records.) This revealed that departmental RRSs together have 1390 record type entries in 95 different record groups.

Many of these record groups apply to the specific business of the individual department, and did not need any further examination to determine their consistency with other departments. A visual check was made against record types which could be shared across more than one department looking for inconsistencies of the following types:

- Same record type, but with a different retention period
- Inclusion of the record type in one department, but not another

A difficulty faced with making the comparisons apart from the sheer volume of material was in trying to apply a consistent means of referring to the same thing. For instance, a health and safety audit report could be categorised under ‘audit’ or ‘health and safety’. Both approaches had been used by different departments.

In addition, where there were differences, it was not clear which approach should be adopted by all. The advice offered was to follow the JISC BSC² (Business Classification Scheme) retention period unless there was a reason to do otherwise.

Observations on variations in inclusions

Departments have taken a pragmatic approach to the development of the first version of their RRS, and focused on key records. Departments will have different views on what constitutes key records, and so inconsistencies in record type inclusions should be expected.

For instance, all departments would be expected to be generating and holding records relating to the management of records, and FMH, HRD, HUM, ISD, Partnerships, REN, and VCO included this in their RRS. Similarly, only 8 RRSs included a retention period for holiday entitlement, and records relating to first aiders feature in the RRS for FMH, HUM, SCI and ISD.

¹ <https://intranet.uea.ac.uk/is/strategies/infregs/Records+management+policy>

² <http://bcs.jiscinfonet.ac.uk/he/default.asp>

All departmental contacts were informed of areas to consider for inclusion in their next RRS version.

Observations on variations in retention periods

Most departments used the template suggested and developed RRSs with retention periods in line with each other (as they were using information from the same source).

A small number of inconsistencies were noted and departmental contacts were informed to consider any changes when they next review and revise the schedule. It would be difficult to advise on what the period should be as it should suit the purposes of the department.

The RRS as currently worded do not indicate whether the department is the holder of the master record or a copy. A shorter retention period is acceptable where the department holds a copy for their own purposes, and another department (such as HRD or FIN) holds a master record on behalf of the institution where there is a need to satisfy statutory compliance.

For instance, FOI requests are mentioned only by ISD (under information compliance) and FMH. ISD hold records on requests for Last Action + 3 years, whereas FMH hold records for Duration of enquiry + 2 years.

Next steps

A greater concern is to check that progress is being made in embedding the RRS into departmental operating procedures so that records are being managed actively, and that a process for maintaining, reviewing and updating the RRS is in place so that new record types can be added, redundant ones removed, and retention periods adjusted as needed (and as determined by changes to regulations).

A poll of departmental contacts yielded the comments summarised in Appendix A.

Significant progress has been made with establishing records management at the University since this piece of work was first initiated.

It is proposed that from this point, it is managed as business as usual for the ISD information compliance team liaising with the network of departmental records management contacts.

A further question to be considered is whether there remains a need for routine reports providing assurance on the application of records management within departments, and what form (if any) of governance is required.

Appendix A – Departmental records management progress

<i>Department</i>	<i>RM processes</i>
FMH (Finance)	Records are reviewed and disposed of at end of financial year. New items are added to the RRS during the year.
HRD	HR is regularly reviewing its retention of files and documents are we are currently in the process of disposing of information which has passed its retention deadline. We review our Records Retention Schedule every six months to ensure that we have not overlooked disposing of anything.
ISD	A central records management service for the department has been established. The member of staff leading on RM retired in the summer and his responsibilities have not yet passed to a replacement member of staff. The RRS is to be reviewed and updated in line with processes in place for other department policies.
PLN (Room Bookings)	Records are reviewed at the end of academic year.
PLN (SRO)	For student records we remove the old paper from the files on a cycle and put it into confidential shredding. We would consider the RRS for any new paper file we created at the point we create it. So far we haven't started to collect anything new since we did the RRS.
REN	RM is embedded into departmental processes.
SSF	Will put in place a process for reviewing and updating the RRS. A new SFM is in post and will be consulted on embedding RM into department processes.
USS	RRS in place for Safety Services. Gradually going through old records to bring them up to RRS spec. This is estimated to take about two years.
VCO (complete dept)	VCO has an embedded policy for records management. We have a review in August of each year when we decide what should be disposed of in accordance with our schedule. We have taken steps to minimise the amount of paperwork we hold, in order to help with the process.
VCO (Development)	Recent staff turnover has slowed the application of RM in Alumni and Organisations. The transition to a new online system for the call campaign has improved compliance in the handling of the associated records. Paper based finance records will be held for a further year then disposed of as advised following the introduction of ABW. The RRS will be reviewed each year.