



# Records Management Policy

## 1. Purpose

The purpose of this policy is to provide a framework for records management at Exeter College in support of good governance and in compliance with its legal, regulatory and ethical obligations. It outlines the College's approach to good recordkeeping and defines responsibilities for the control and maintenance of records and information within the College.

## 2. Background

*Record:* 'information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business.'

ISO 15489

*Recordkeeping:* 'the processes and systems an organisation uses to make sure that records can be found quickly and easily and that they are preserved for as long as they are needed.'

PARBICA

'Records are the life-blood of any organisation, providing evidence of actions and decisions, supporting business functions and protecting its interests and reputation as a trusted institution.'

FOI Sec 46 Code of Practice on Records Management

Exeter College was founded in 1314 and is a world-class teaching organisation and institution of historic standing. Records are a vital part of the College's institutional memory, providing important historical information and representing a significant part of the educational history of the United Kingdom. They map the College's development over time, constituting a key resource for both academic research and the current administration of the College.

The College is a designated public authority under the terms of the *Freedom of Information Act* and must comply with data privacy legislation<sup>1</sup>. Both these acts and associated legislation provide enhanced rights of access to information. Furthermore, they require the College to maintain the security and confidentiality of personal data and to demonstrate compliance through transparent procedures in its handling of information.

<sup>1</sup> Regulation (EU) 2016/679 (General Data Protection Regulation), Data Protection Act 2018

Managing information assets in an efficient way is critical to the operations of **Exeter College** and can help to save time and money by ensuring that vital information can be located and is protected against accidental or unauthorised loss or destruction. Failure to manage information increases the risk of financial and reputational losses.

The aims of this policy are consistent with an institution committed to excellence in both teaching and research and reflect also the character of the College's historic recordkeeping activities.

### 3. Scope

This policy applies to all College employees, including temporary and casual employees, and to contractors and volunteers.

This policy relates to all records generated or received in the course of business which provide evidence of the functions, activities, and transactions of the College and its members. The records may be in any format or medium, including electronic documents. All records created in the course of College business are College records.

### 4. Objectives

In support of good governance, Exeter College is committed to achieving best practice in its recordkeeping activities. To do this, it aims to progressively improve its recordkeeping to comply with the *International Standard on Records Management* (ISO 15489). The College aims to create and maintain authentic, reliable and useable records:

- a) to comply with its statutory and legal obligations, relating to financial and environmental concerns, health and safety and contractual agreements,
- b) to safeguard personal and other data and meet its obligations under the *Data Protection Act 2018*, the *Freedom of Information Act 2000*, and other legislation,
- c) to provide evidence and information about policies and activities, and protect the interests of the College in interactions with stakeholders and uphold its rights and obligations towards individuals and organisations,
- d) to improve working practices, for example through better retrieval of records, ensuring that staff can identify the most up-to-date and accurate information,
- e) to prepare for business continuity and disaster planning,
- f) to optimise storage, both physical and electronic, and contribute to the College's sustainability agenda,
- g) to recognise the value of information as a corporate resource and protect it against loss or damage,
- h) to identify and preserve significant records of historical value for the College and for wider research.

### 5. Records Management Framework (RMF)

The College will build its recordkeeping capacity to improve structures, processes, staff, resources and rules to work together and to manage its records well.

The records management framework will ensure that all members of the College:

- a) create records which give an accurate and complete account of the College's activities and transactions,
- b) store records within suitable filing systems to enable easy retrieval and avoid unnecessary

- duplication,
- c) control access to records in accordance with their level of confidentiality and importance,
- d) preserve records for the correct length of time, and dispose of them securely in line with College retention and disposal procedures,
- e) make accountable decisions about disposal of records no longer required for current business.

To provide the foundation of the records management framework, **Exeter College** will conduct a records management survey and develop a minimum set of retention and disposal controls, known as the baseline. The baseline will support **Exeter College** in achieving its records management objectives and shall be communicated to users and relevant external parties.

The College will work to ensure that:

- f) all College members are appropriately trained and are familiar with all **Exeter College** policies and procedures relating to recordkeeping and management of information; staff who handle personal and sensitive data are given additional recordkeeping training,
- g) records risks are assessed and adequately managed; incidents are reported in a timely manner via appropriate management channels, and properly investigated and managed;
- h) all relevant records management requirements of **Exeter College** are covered in agreements with any third-party partners or suppliers, and compliance against these is monitored;
- i) Owners are identified for all **Exeter College** information assets on the College Information Asset Register, and rules and responsibilities for their maintenance and use are in place; and
- j) records management controls are monitored to ensure they are adequate and effective.

## 6. Responsibilities

The following bodies and individuals have specific records management responsibilities:

- **The Rector** is accountable for the effective implementation of this records management policy and supporting rules and standards within **Exeter College**;
- **The Governing Body** has executive responsibility for records management within **Exeter College**. Specifically, the **Governing Body** has responsibility for overseeing the management of the security risks to **Exeter College's** staff and students, its infrastructure and its information;
- **The Finance and Estates Bursar** and **The Fellow Archivist** are responsible for establishing and maintaining **Exeter College's** records management framework to ensure the availability, integrity and compliance of recordkeeping within the College. A Records Management Task Force will oversee the development of Exeter College's recordkeeping arrangements;
- **The College Archivist/Records Manager** has responsibility for developing and implementing records management policies and procedures;
- **The IT Manager** has responsibility for implementing and managing the IT technical controls;
- **Heads of Department** are responsible for ensuring
  - that recordkeeping practice within their department conforms to the requirements of this policy,
  - that all staff within their department know about, understand and comply with this policy,

- that staff receive suitable recordkeeping training;
  - recordkeeping procedures are reviewed and updated as necessary.
- **All staff** are responsible for creating and maintaining accurate records and complying with recordkeeping policies and procedures

## 7. Compliance

The College regards any breach of this policy as a serious matter, which may result in disciplinary action.

## 8. Review and Development

This policy, and supporting policies and procedures, shall be periodically reviewed and updated by the Finance and Estates Bursar and Fellow Archivist and approved by the **Governing Body** to ensure that they:

- remain operationally fit for purpose;
- reflect changes in technologies;
- are aligned to recognised best practice; and
- support continued regulatory, contractual and legal compliance.

**This Records Management Policy should be read in conjunction with the following College policies on**

- Information Security [\[link\]](#)
- Data Protection [\[link\]](#)

Internal

- *Departmental Retention and Disposal policies*

By College Order 20/108, this policy was approved by Governing Body on 2<sup>nd</sup> December 2020 with immediate effect, and is to be reviewed by December 2023, and was also approved for display on the website.