

UNIVERSITY OF LONDON

RECORDS MANAGEMENT AND ARCHIVE POLICY

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**Judith Etherton
University Archivist
November 2002**

INTRODUCTION

This is the second edition of the Records Management Policy and builds on the first version, which was adopted by the University's administration in September 1999, by extending its provisions to include an archive policy and guidance on the management of electronic records.

The Policy supports the effective running of the University's central administrative offices, Responsibility Centres and central Institutes by ensuring that both paper and electronic records necessary for its business are available, accessible, and accurate so that the University can satisfy the needs of corporate accountability, statutory obligations, evidential admissibility and audit requirements.

The Policy provides the framework which will enable the University's central administration to move towards a greater reliance on information in electronic form while, for the immediate future, setting out clearly when a "print-to-file" policy should be used followed by the deletion of the electronic record.

1. AIMS OF THE POLICY

- 1.1 The Policy provides a basic framework to apply a consistent, sustainable and efficient records management strategy by defining the method for the management of records, both paper and electronic, created by the central University's administration, responsibility centres and Institutes. It allows the University to select what it retains as a permanent record of its activities and enables the destruction of those records which have outlived their administrative usefulness and are without significance for the historical or legal record. The criteria for the selection process are informed by Government legislation currently in force and by the agreed administrative, financial, legislative and historical needs of the central University administration, responsibility centres and Institutes and is recorded in Retention Schedules.
- 1.2 A detailed list of records to be permanently retained will be found in the appropriate Retention Schedule relating to each Division, Responsibility Centre or Institute but can be summarised as including those which provide:
 - (i) Administrative value: records which provide information on former activities and decisions to provide background information, establish the existence of a precedent or to substantiate or refute a claim or allegation.
 - (ii) Financial value: documentary evidence of the way in which monies were obtained, planned, allocated, controlled and expended
 - (iii) Legal value: records which will provide the source of the authority for actions taken by the University or individuals and show evidence of title, contractual obligations, duties and privileges
 - (iv) Historical value: records which provide the corporate memory of the activities of the central University, its Responsibility Centres and Institutes. This will include those records created for the purposes highlighted in (i)-(iii) above, but will also include records of single or significant events and activities which will provide evidence for the history of the University
- 1.3 These practices are designed to enable staff to find with minimum delay and effort information required for their work and to encourage a 'clear desk' policy in individual offices. They also facilitate the management of space by the use of a semi-current storage area for those records not in immediate daily use which will reduce long-term operational costs to the University.
- 1.4 The Policy provides for the effective capture and management of electronic records.
- 1.5 These practices will ensure that legal obligations, especially those under the Data Protection, Freedom of Information and Health and Safety at Work Acts are observed.

SCOPE OF THE POLICY

- 1.7 The Policy aims at this stage to inculcate a culture of electronic record keeping so that all staff are aware that they are responsible within their own sphere of action for ensuring that evidence of business activity is created and captured.
- 1.8 It is an aim of the Policy to lay the foundations for further development towards a greater, if not total, reliance on electronic records at some point in the future. The management principles laid out in this Policy, including the print-to-file policy, will put the University's administration in a position to take advantage of future technological developments in the management of electronic information as they occur and will assist in making a smoother passage to an increased electronic environment without the loss of corporate memory or accountability entailed by unmanaged electronic records.

2. SCOPE OF THE POLICY

- 2.1 All records (academic, administrative and personnel), whether paper or electronic, created and received by employees in the course of the University of London's business are the official records of the University. None may be discarded, destroyed, donated or otherwise disposed of except in accordance with the University's Records Management and Archives Policy.
- 2.2 Responsibility for the management of the current administrative records and archives of the central University, the Responsibility Centres and central Institutes lies with the University Archivist who is supported by a Records Manager. The University Archivist reports to the University Librarian.
- 2.3 All records of whatever format are included in the scope of this Policy when they document the University's business except for those legal and estate records held by the University's solicitors, Allen & Overy, which are outside the scope of this policy.
- 2.4 This Policy covers electronic records generated by software tools, such as MS Office, where the end user is responsible for the data integrity and ensures the preservation of those records such as electronic mail and word-processed documents that need to be kept for long-term administrative, legal or historical reasons by emphasising a print-and-file approach. While this is not technologically advanced, it is currently the most effective interim strategy for the management of information that has been created in an electronic format but has long-term significance.
- 2.5 The Policy recognises that facilities that support electronic records management must be built into the information system applications that are used to generate electronic records to ensure that each of these is capable of capturing the records themselves together with all contextual information.
- 2.6 The Policy recognises that the University already creates electronic records which cannot be converted to paper without the loss of value and, therefore, lays the basis for the development of an electronic records preservation strategy.

3. THE POLICY STATEMENT

- 3.1 The basic unit of record keeping is the paper file or the electronic folder. All decisions about records will be made about files and folders rather than individual documents within the files or folders.
- 3.2 All management decisions about the fate of files and folders will be made jointly by the University Archivist and the generating Division, Responsibility Centre or Institute. Individuals within each of those bodies will be identified to take responsibility for master versions of documents in order to avoid unnecessary long-term retention of duplicates.
- 3.3 Any administrative paper file will be in one of three states during its working life:
- **current** when records may be added to it
 - **semi-current** when it has been closed but is used as a reference tool for administrative purposes
 - **archival** if retained after its semi-current life and is selected for permanent retention in the University archive.
- 3.4 Files are moved from one stage to another on a pre-determined basis set out in the retention schedules. Only records of continuing administrative value are to be filed and retained as current records; ephemeral records should not be kept and must be disposed of by staff as they see fit.
- 3.5 Files and folders are to be closed on a regular basis. This will normally be three years after creation. This period will not always be appropriate; for example, if there is a lot of activity on the file it must be closed when it is approximately 5cm thick to avoid papers being damaged, and a new volume opened.
- 3.6 Files held in semi-current storage will be accessed only by the University Archivist, Records Manager, or Data Protection Officer in order to provide a secure environment.
- 3.7 Closed files and folders will be reviewed at pre-determined intervals, typically five years after closure and decisions about further retention made in accordance with the record retention schedules drawn up for each Division, Responsibility Centre and Institute.
- 3.8 Electronic records of value to the University's business must be captured into a corporate current filing structure and must be accessible to all authorised staff.
- 3.9 Electronic records must be structured into directories, sub-directories and folders with other electronic records that form part of the same narrative to ensure that all evidence of the same business activity is grouped together and safeguarded.
- 3.10 The electronic filing structure must capture all metadata needed to identify, access and retrieve the electronic record so that it is possible to establish the context of the record, who created it, during which business process, and how the record is related to other records.

POLICY STATEMENT

- 3.11 All files and folders that have outlived their administrative usefulness and are not of historical significance will be destroyed in a secure manner. Destruction of files and folders will take place only after consultation with the creating Division, Responsibility Centre or Institute.
- 3.12 The principles governing the closure and subsequent retention of electronic records are identical to those for paper records although systems are not yet in place to put these into practice.
- 3.13 All records made or received by the University in the course of its business that are of continuing value for historical or legal reasons must be transferred to the University Archive. Such records will include papers of the University's governance and finance, major administrative committees, leases and legal title to property, records documenting substantial work to the University's estate, policy and procedures documents generated by Divisions, Responsibility Centres and Institutes, publicity material, records relating to staff. This list is not complete but is given by way of example. These records can be in any medium such as paper, microform, film, magnetic tape or disk, optical disk, video or audiotape.
- 3.14 The University Archivist, Records Manager, and Data Protection Officer will be available to offer advice and guidance. Training in the records management procedures will be available to staff of the Divisions, Responsibility Centres and Institutes when required.

4. THE MANAGEMENT OF PAPER RECORDS

- 4.1 Paper records covered by this Policy are kept in files.
- 4.2 Files are either:
- **current** when records may be added to it.
 - **semi-current** when, on closure, no records may be added although the file may still be used for administrative reference purposes.
 - **archival** when, after a further period, if selected for permanent retention the files will be used as historical sources or legal records rather than as administrative documents.
- 4.3 Files are classified by type of function so that global decisions can be made about the fate of all similar records, in particular whether they are to be kept permanently or destroyed. The University Archivist, Records Manager, and Data Protection Officer will work with each Division in the Central University, Responsibility Centres and central Institutes to identify types of file and to draw up a records retention schedule to identify the length of time for which different types of file need to be kept. Relevant statutory requirements for records such as finance and personnel will be taken into account.
- 4.4 Designated personnel will be charged with keeping the master version of some records. This will enable other members of staff to destroy their copy when it ceases to be of immediate use.
- 4.5 The Records Manager should be contacted when closed files are to be transferred to the Central File Store. There should be orderly and periodic transfer of inactive records from prime office storage space to the intermediate storage area.
- 4.6 Once a request is received, records management boxes will be supplied to the office making the transfer. An Excel transfer template must be completed with details of each file placed in the box and forwarded to the Records Manager. The Records Manager will assign management details and place the box in the Central File Store.
- 4.7 Requests for retrieving files must be sent to the Records Manager. For security reasons in order to ensure that the central University meets standards for legal admissibility, the Central File Store will only be accessible to the University Archivist, the Records Manager and the Data Protection Officer.
- 4.8 Files may only be withdrawn by staff of the creating/controlling Division; the Head of the Division or a designated officer within that Division must authorise access to files by anyone outside the Division.
- 4.9 All files are reviewed at suitable periods after their creation, typically at five years after closure, to ascertain whether they should be destroyed or passed to the University Archive for permanent retention. These review dates are set out in retention schedules

MANAGEMENT OF PAPER RECORDS

which are available to all staff. All such reviews are done in conjunction with the creators of the files and the relevant Division, Responsibility Centre or Institute

5. PRINCIPLES GOVERNING THE CREATION AND CAPTURE OF ELECTRONIC RECORDS

5.1 It is realised that the reliance of the University's business on electronic records can only increase. In order to move toward reliable retention of electronic records while they are current, semi-current and held for long-term preservation and to ensure their future legal admissibility, an electronic preservation strategy must be developed which will:

- determine compatibility across the central University
- define appropriate levels of access to information
- enable records in an electronic format to be kept for long-term retention to meet administrative, statutory and historical needs
- prevent the loss of records caused by media deterioration and obsolescence
- ensure that records and their contextual metadata are stored in such a way as to prevent future modification or deletion by users
- preserve data and metadata in a format that is independent of proprietary hard and software

5.2 'Archiving' is a term used by IT personnel and generally refers to the wholesale retention of all data for a prescribed time before its deletion. However, the management of electronic records for medium to long-term preservation and access requires the more structured approach which is traditionally understood by the term 'records management'. The structured approach will address control of the creation, capture, alteration, dissemination, storage and destruction of each electronic record as well as issues of authority and version control.

Creation

5.3 Electronic records judged to be of value to the University's business activities, like their paper counterparts, must be viewed as belonging not to the creator or recipient but to the University as part of its corporate information resources.

5.4 When a new document is created, a template will prompt the creator to register the details of the new document: appropriate title, date of creation, name of creator. There will be the option to cancel this and proceed without registration if the document is of a purely personal or ephemeral nature.

5.5 All staff will be responsible for making a judgement on whether to register a document or not and for completing the registration template accurately and fully.

PRINCIPLES GOVERNING THE CREATION & CAPTURE OF ELECTRONIC RECORDS

Capture

- 5.6 Electronic records, like all other business documents, have differing values. Those with continuing administrative value must be captured into a structured electronic filing system. Ephemeral electronic documents of no enduring value, such as those of purely personal relevance, must not be filed but deleted from the system at the earliest opportunity.
- 5.7 Once identified as of continuing value to the business of the University, electronic records must be moved out of personal workspace (currently the drive) into shared workspace (the ... and ... drives) and filed in the appropriate electronic folder.
- 5.8 Each electronic folder will be in one of three stages during its working life:
- **current** when records may be added to it;
 - **semi-current** when it has been closed but is used as a reference tool for administrative purposes;
 - **archival** if retained after its semi-current life and is selected for permanent retention in the University archive. The permanent retention of electronic records is dependent on future technological developments.
- 5.9 Responsibility for the capture and maintenance of electronic records will rest with all staff who create and use them.
- 5.10 Isolated records are of minimal value, therefore records, including e-mails, must be saved into a structure of directories and folders. Each record will form part of a narrative and a greater insight into that particular business activity will be gained by reading the individual record within its wider context. The structure of the directories, sub-directories and folders, must be simple and logical. It should proceed from the general to the specific, by dividing a broader theme into sub-themes.
- 5.11 Electronic folders must be organised by type in the same way as paper files. This will enable global decisions to be made about the fate of similar records.
- 5.12 In order to ensure that each electronic record is appropriately titled and linked in folders to related records, clear, consistent terminology and any standard naming conventions must be used for titles so that records can be identified and retrieved quickly and accurately, and so that staff can recognise records that others have filed.
- 5.13 The filing process must involve the identification and saving of information which details the context as well as the content of the record. Metadata elements must be stored in a profile which is clearly and indissolubly attached to the record itself.
- 5.14 The folder system must use the same file titles/index terms as the paper filing system.

Alteration

PRINCIPLES GOVERNING THE CREATION & CAPTURE OF ELECTRONIC RECORDS

- 5.15 Once added to the electronic filing structure, the record should not be capable of change. New versions of the record must be created by making and editing a copy and saving this as a new record.
- 5.16 IT systems controlling electronic records must include an audit trail to document significant uses of each record.

Dissemination

- 5.17 In order to avoid the content of a file being divided between paper and electronic media and, because of the current lack of a universal software system within the Senate House, to avoid part of a file held electronically being inaccessible to all who might need to read it, electronic records belonging to a paper file which already exists must be either transferred to paper and filed (e.g. e-mails) or, where this is not possible (e.g. a database) appropriate consistent references linking the electronic file to the paper file must be used.
- 5.18 An electronic audit trail must be kept to capture significant actions which have been taken on a record, including the date of the action and identification of the individual responsible.

Storage

- 5.19 Folders of electronic records must be closed and reviewed for retention in the same way as records held in a paper format. If, according to the retention schedule for a particular Division, Responsibility Centre or Institute, they are to be retained for a number of years before disposal, they will continue to be held in an electronic format, but will be moved off-line. These folders must not be deleted from the system except in relation to retention periods specified in approved retention schedules (see 5.24).
- 5.20 Until the University has established a policy for the permanent preservation of non-current records in an electronic format, electronic mail and word-processed records that need to be kept permanently must be transferred to paper and filed. These records will be those that contain evidence of decisions and decision-making processes and those which provide a record of historical interest (see para. 1.2). This print-to-paper directive will continue until there is a fully integrated electronic information management system across the central administrative departments, the Responsibility Centres and the central Institutes.
- 5.21 However, there are records of historical significance which it would be inappropriate to transfer to paper for permanent retention, such as copies of the web site and any other record where the electronic format is an intrinsic part of the meaning of the record. Until a strategy is in place for the permanent preservation of these records, their long-term retention cannot be guaranteed.
- 5.22 Meanwhile, web pages and other similar electronic records, which have been selected by record creators in consultation with the University Archivist for long-term preservation, must be moved off-line or onto CD-rom and accompanied by all documentation sufficient to identify the data, the context of the data and the software and hardware required to access them.

PRINCIPLES GOVERNING THE CREATION & CAPTURE OF ELECTRONIC RECORDS

Destruction

- 5.23 Electronic records which have not been registered and those which have not been filed into the structure of electronic folders must be periodically deleted.
- 5.24 Folders of electronic records which are not to be retained permanently, must be deleted in accordance with the agreed retention schedule in the same way as paper records.

6. THE UNIVERSITY ARCHIVE

- 6.1 The archive of the central University represents its corporate memory and contains those records created by the central administration, the Responsibility Centres and Institutes which are deemed to have continuing and permanent value because they contain evidence of decisions and decision-making processes. Some additional records will be selected because they provide a record of historical interest.
- 6.2 All records created by the central University and Responsibility Centres which are selected for permanent retention must be kept in the University Archive under the care of the University of London Library, together with any other material which is considered to be of significance to the history of the University.
- 6.3 Records created by Institutes and selected for permanent retention must either be passed to the University Archive under the care of the University of London Library or be maintained by an appropriately qualified professional in appropriate storage conditions within the individual Institute.
- 6.4 All materials in the University Archive will be catalogued in accordance with international archival standards.
- 6.5 Items in the University Archive will be made available on loan to University staff on request. However, when an archival record is in a fragile condition the University Archivist will request that the item be consulted in the Palaeography reading room of the Library. Staff are asked to sign for the receipt of an archival item in the Loans Book and to state an approximate date for its return. Staff will be reminded on a periodic basis to return the item. Archival items on loan to members of staff should be returned if a request for access is received from a member of the public.
- 6.6 Any member of staff outside the creating Division, Responsibility Centre or Institute who wishes to have access to a particular file during the 30-year closure period will need to obtain authorisation from an appropriate member of the creating Division, Responsibility Centre or Institute to do so.
- 6.7 Members of the public may consult material over 30 years old which is not subject to any special restriction. Access to more recent material would be permitted with the agreement of the head of the creating Division, Responsibility Centre or Institute.
- 6.8 Conservation considerations require that most archives other than files (photographs, models, film, for example) be consulted by staff in the Palaeography reading room of the Library.
- 6.9 The University Archivist will maintain a list of files for which extended closure periods beyond 30 years have been agreed.

GLOSSARY

*Many of these terms have been taken from the Australian Standard which has formed the basis for the newly issued International Standard for Records Management.
<http://www.records.nsw.gov.au>*

an archive

The body of records of continuing value created by an organisation or individual. Sometimes called 'corporate memory'.

The University Archive

The corporate memory of the central University, i.e. records created by the central University, Responsibility Centres and Institutes, which have been appraised, considered to be of continuing value and kept for permanent preservation.

appraisal

The process of evaluating business activities to determine which records need to be captured and how long the records need to be kept to meet business needs, the requirements of organisational accountability and community expectations.

current records

Also known as **active** records. Those records required for the day-to-day functioning of an organisation or individual.

database

An organised collection of interrelated data. It consists of two parts: the elements or individual pieces of data contained in the database (the content) and the structures which organise these pieces. Both the content and the structures are essential parts of the database records.

disposal

A range of processes associated with implementing appraisal decisions. These include deletion or destruction from recordkeeping systems or the transfer of records to the archives.

electronic records

Records which can be created or received, stored and retrieved, maintained and transferred in digital form. They may be in the form of databases, electronic mail, spreadsheets, word-processing files, or multi-media communications.

folders

A group of records in a logical structure that shows the position of one record in relation to others. A folder has an identifying title or label and other characteristics, and is part of a wider structure which reflects the business activities of the organisation. By means of the folder/directory, a group of records can be managed together and the same actions can be taken on all records at the same time.

metadata

This term refers to data describing data and data systems; in electronic recordkeeping, this means data that must be captured along with the electronic records themselves to enable them to be understood and to support their management and use.

record

Recorded information, in any form, created or received and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity. They include sufficient content, context and structure to provide evidence of that activity. Records are not ephemeral; they contain information that is worthy of preservation in the short, medium or long term.

retention period

The length of time before permanent storage as an archive or destruction, usually based on an estimate of the frequency of use for current and future business and taking note of any long-term historical value of the record.

retention schedule

A systematic listing of records created by an organisation which sets out the retention periods of records from the time of their creation to their disposal. It is a continuing authority for implementing decisions on the value of records specified in the schedule.

semi-current records

Also referred to as **semi-active** records. Those records which are required so infrequently in the conduct of current business that they can be transferred from offices to separate [secondary] storage areas.

The central offices, Responsibility Centres and Institutes

Divisions

Vice-Chancellor's Office
Academic Policy and Services Division
Central Secretariat
Estates Division
External and Internal Student Administration
Finance and Accounting Division
Staff and Student Services Division

Institutes

British Institute in Paris
University Marine Biological Station Millport
School of Advanced Study:
 The Institute of Advanced Legal Studies
 The Institute of Classical Studies
 The Institute of Commonwealth Studies
 The Institute of English Studies
 The Institute of Germanic Studies
 The Institute of Historical Research
 The Institute of Latin American Studies
 The Institute of Romance Studies
 The Institute of United States Studies
 The Warburg Institute
Philosophy Programme

Responsibility Centres

Careers Service
Convocation
University of London Library
Intercollegiate Halls of Residence
London Universities Purchasing Consortium
Postgraduate Medical Deaneries
University of London Computer Centre
University of London Union