



Records Management and Archiving Policy

ELT manager	Director of Finance
Responsible officer	Estates and Facilities Manager
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Further information (where relevant)	

Reviewer	Date	Review Action/Impact	BoM

Records Management and Archiving Policy

WHC reserves the right to amend this policy at its discretion. The most up-to-date version can be downloaded from our website.

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1.0 Purpose

- 1.1 The purpose of this policy is to provide a framework to ensure that a records management function is established within the College. This will ensure that records are managed in a way that supports the sharing of knowledge and information. The policy aims to promote best practice and to allow the College to comply with its statutory obligations, mainly under the Freedom of Information (Scotland) Act 2002 and the Data Protection Act 2018.

2.0 Policy

- 2.1 West Highland College UHI recognises that recorded information is a key resource to effective operation and accountability, providing valuable evidence of the College's activities and transactions.
- 2.2 Records are vital to the College in its current and future operations, in meeting legislative requirements, for the purpose of accountability and for an awareness and understanding of its history and procedures. The College's Records Management Policy requires that records should only be kept for as long as they are needed for legal, business, or other reasons.
- 2.3 The long-term storage of records is very expensive, both in terms of the space occupied and the human resources needed to look after them.
- 2.4 This policy governs the retention and disposal of records by West Highland College UHI, to ensure records are managed in a systematic and cost-effective manner.

3.0 Scope

- 3.1 This policy applies to all recorded data which is created, collated, processed, used and retained in the course of College business. This can include paper, electronic, digital, and multimedia records.
- 3.2 Records Management is the practice of maintaining the records of an organisation from the time they are created up to their eventual disposal. This may include classifying, storing, securing, and destruction (or in some cases, archival preservation) of records.
- 3.3 Departmental retention schedules detail staff responsible for retention and management of various records. Records should not be kept for any longer than the maximum retention period specified in said retention schedules.
- 3.4 The policy covers all records retained and managed by the College.

4.0 Responsibilities

- 4.1 The member of staff designated as The Freedom of Information Officer is responsible for the design, implementation and maintenance of this policy. The Freedom of Information Officer will also be responsible for staff awareness of records management issues to ensure that they are aware of their obligations in this area.

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- 4.2 All Directors and Managers are responsible for monitoring the creation, security and disposal of records retained in their department.
- 4.3 All College staff are responsible for ensuring that records they create and receive are managed in accordance with this policy and conform to the guidance and procedures described.
- 4.4 The Estates and Facilities Manager is responsible for management of physical records including the transferral of, and retrieval of records from storage areas.

This policy will be reviewed as necessary to ensure compliance with legislation and fulfilment of College requirements.

5.0 Definitions

Data Protection Act 2018 - Provides legal rights to individuals with regard to the personal information held about them by others.

Freedom of Information (Scotland) Act 2002 - Provides a general statutory right of access to information of any age and in any format held by Scottish public authorities, subject to a number of limited exemptions.

Archives - Records that are recognised as having long-term (including historical and cultural) value.

Business Critical Records - Those records crucial to the conduct of the College's business and without which the College would be unable to function should they be destroyed by fire, flood or any other catastrophe.

Disposal - The process of destroying records at the end of the appropriate retention period.

Non-Business Critical Records - Those records which have little or no business value, though they may be used for other purposes.

Records - Any data held by the College in any format. They may relate to individuals, statistics, finance, procurement or any other aspect of College business.

Records Management - The process for the systematic management of all records and the information or data that they might contain.

Retention Periods - An index to different types of records, detailing how long they should be kept for in order to meet operational and legal requirements.

6.1 Key Principles

Each area of the College must have in place adequate arrangements for documenting its activities, with due regard to any relevant legal and regulatory instruments which may apply. Arrangements will reflect the following aspects:-

6.1 Record Creation

- Appropriate records, arranged and indexed for rapid retrieval.
- Procedures for keeping the system updated.
- Appropriate staff training for those who use the system(s).
- Retention periods (see departmental retention schedules).
- The process for creating and maintaining a robust records system is outlined in Appendix 1.

6.2 Records Maintenance

Appropriate storage facilities, which allow access for relevant staff, but are secure enough to comply with Data Protection Law (see the College Data Protection Policy).

Identify vital records and apply appropriate protection, including backup if applicable.

6.3 Records Closure

Records should be closed as soon as they have ceased to be of active operational use (usually after no more than 4 years). Non-current records should then be moved to designated storage facilities.

6.4 Retention Periods

The College will retain permanently records which are essential to the College and which document policy, structure and process, including:

- Legal status and remit.
- Principal administrative processes.
- Top level decision making and policy formation.
- High profile aspects of interactions between the College and its major partners or community.

Realistic retention periods for records should be decided as records are created; Appendix 3 may be used as a guide.

Consideration should be given to the following factors:

- Is the record required for day to day running of the College?
- Is the record required for legal purposes, e.g. invoices, major contracts?
- Is there legislation that governs how long the record should be kept, e.g. European grant funding records?
- Is it liable to be of ongoing public interest (Freedom of Information)?

At the end of the retention period, an appraisal process should be undertaken to decide if the records should be retained for longer, archived or destroyed. A schedule should be retained to record this process (see Appendix 2).

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6.5 Disposal

All records authorised for disposal must be destroyed in as secure a manner as is necessary for the level of confidentiality or security they merit. This applies to electronic records as well as physical records.

Linked Policies/Related Documents

- Data Protection Policy
- Freedom of Information Model Publication Scheme
- Environmental Information Regulations Policy (Draft)

Relevant Legislation

- Freedom of Information (Scotland) Act 2002
- Data Protection Act 2018

Appendix 1

Active Records Management Process

Inventory

- Identify record classes.
- Do copies exist? Ascertain master copy.
- Establish location and ownership.
- Identify retention obligations; statutory, regulatory or public interest.
- Review existing retention practice; is the current retention period appropriate?

Storage

- Storage arrangements should allow for easy retrieval.
- Location should be secure, in line with the confidentiality and/or sensitivity of the information.
- Ensure environmental conditions are appropriate to avoid potential damage to the records.

Appraisal and Disposal

- At the end of the retention period, the relevant manager should appraise records and mark for further retention, archival or disposal as appropriate.
- Record activity using form available at Appendix 2.

