



Records Management Policy

POL-NWH-003

Lead Officer (Post):	Vice-Principal Operations
Responsible Office/ Department:	Governance
Responsible Committee:	Audit and Risk Management Committee
Date policy approved:	01/08/2023
Date policy last reviewed and updated:	n/a
Date policy due for review:	01/08/2026
Date of Equality Impact Assessment:	01/08/2023
Date of Privacy Impact Assessment:	n/a

Accessible versions of this policy are available upon request. Please contact UHI North, West and Hebrides for more information.

Policy Summary

Overview	<p>Why is the policy required?</p> <p>This document provides advice on the records management policy and procedures of UHI North, West and Hebrides.</p>
Purpose	<p>What will the policy achieve?</p> <p>Definition of records management policy and procedures for the college community and relevant external stakeholders.</p>
Scope	<p>Who does the policy apply to?</p> <p>The policy applies to all college staff.</p>
Consultation	<p>Who has been consulted on the policy, and who will be notified?</p> <p>This policy has been adopted from the UHI Records Management Policy.</p>
Implementation and Monitoring	<p>Who will be responsible for implementing and monitoring the policy, and what resources/ costs will be incurred?</p> <p>The Board of Management has responsibility for implementing and monitoring the policy, as well as ensuring that the policy is updated and made available to all relevant college communities.</p>
Risk Implications	<p>What are the risk implications of this policy?</p> <p>Failure to adhere to this records management policy will result in breaches of legislation and good practice.</p>
Link with Strategy	<p>How is this policy linked to University strategy?</p> <p>This policy is required to meet statutory requirements.</p>
Impact Assessment	Equality Impact Assessment: Completed, no further action required.
	Privacy Impact Assessment: Not required.

1. Policy Statement

- 1.1 UHI North, West and Hebrides recognises that efficient management of its records is essential, both for effective administration and to enable it to comply with legal and statutory requirements.
- 1.2 The purpose of this policy is to provide a single 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.
- 1.3 The purpose of this policy is to provide a single framework to ensure that a records management function is established and implemented within the college. This will ensure that records are managed in a way that supports the sharing of knowledge and information and maximises the University's information assets.

2. Definitions

- 2.1 UHI and partners: UHI is an integrated university, made up of a distinctive partnership of independent colleges and research institutions. The partners are: UHI Argyll, UHI Inverness, UHI Moray, UHI North, West and Hebrides, UHI Perth, UHI Shetland, Highland Theological College UHI, Orkney College UHI, Sabhal Mòr Ostaig, and Scottish Association for Marine Science (SAMS).
- 2.2 Data Protection Act 2018: Provides legal rights to individuals with regard to the personal information held about them by others.
- 2.3 Disposal: The process of reviewing records at the end of the appropriate retention period, and actions recommended.
- 2.4 Freedom of Information (Scotland) Act 2002: Provides a 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. Often referred to as FOISA.
- 2.5 Section 61 Code of Practice on Records Management: Guidance for public authorities about the keeping, management and destruction of their records. The Code is a supplement to the provisions in FOISA and its adoption will help authorities comply with their duties under FOISA. It is not a substitute for legislation nor do its provisions have the force of law.
- 2.6 Information Governance: Information Governance is the framework of accountability, process and controls to support effective management of information throughout its lifecycle to meet organisation's business needs and legal obligations. It incorporates the creation, management and destruction of information, information security and access rights.
- 2.7 Record: As per the Section 61 Code of Practice on Records Management, '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'.
- 2.8 Records Management: The process for the systematic management of all records and the information or data that they contain.
- 2.9 Retention period: The period of time records and information need to be retained for.
- 2.10 Retention and Disposal Policy: Identifies the retention and disposal schedule that describes the different types of records created by each department, detailing how long they should be

kept for in order to meet operational and legal requirements, and what action to take when the end of the retention period is reached.

- 2.11 University Archive: Responsible for the management, storage, curation and preservation of university records which have long-term evidential, historical and cultural value for the university.

3 Purpose

- 3.1 This policy aims to support the creation, curation, preservation and management of university records and information, and records systems to:
- Support effective and efficient business processes, service delivery and decision-making.
 - Ensure university records and information are accurate, reliable and comprehensive and avoid unnecessary duplication, forming a single point of truth.
 - Ensure records and information are retained only as long as needed.
 - Ensure records and information are reviewed and disposed of securely in accordance with policy and process.
 - Ensure records and information can be retrieved promptly by those that need to use them.
 - Ensure records and information are protected against unauthorised access, disclosure, alteration or destruction.
 - Ensure records and information remain accessible for as long as they are required.
 - Ensure records and information are managed cost effectively, in the medium most appropriate for the task they perform.
 - Support resilience and business continuity.
 - Enable the college and university to meet its audit and regulatory obligations.
 - Where worthy of permanent preservation as evidence or history of the college and university, ensure records and information are identified as early as possible and transferred to the University Archive accordingly.

4 Scope

- 4.1 This policy applies to all records and information created, received and maintained by college staff in the course of carrying out their corporate functions. Records and information created in the course of research, whether internally or externally funded, are also subject to contractual record-keeping requirements.
- 4.2 All records and documents covered by the Freedom of Information Scotland (2002) Act and Data Protection Act 2018 fall within scope of this policy, although the Acts are not prescriptive about methods of retention. The UK Data Protection Act 2018 covers personal information held as computer records, manual files (e.g., index cards, filing systems etc.) discs, CDs, pen drives, emails, video tapes, paper records and minutes of meetings.
- 4.3 Data must be kept for as long as is required by law, financial and audit requirements.
- 4.4 The University Archive is the central repository for the records of the university, its predecessors and affiliated bodies.

5 Exceptions

- 5.1 This policy covers UHI North, West and Hebrides records, and complements the UHI Records Management Policy which encompasses university records. Staff should consult the University Archivist and Records Manager should there be any ambiguity over record ownership.

Commented [PC1]: Insert, 'Freedom of Information Scotland (2002) Act, and the'

5.2 Otherwise, the policy applies without exceptions, exclusions, or restrictions.

6 Notification

6.1 The latest authorised version of this policy will be available on UHI North, West and Hebrides SharePoint and the college policies webpage.

7 Roles and Responsibilities

7.1 All college staff have records management responsibilities. This includes the need to adopt good practice in creating and maintaining documents and records, ensuring that they are held in an organised and structured fashion to aid retrieval and that information is kept and used in line with the requirements of the UK Data Protection Act 2018.

7.2 Individual departments and sections must maintain and dispose of records in accordance with the UHI North, West and Hebrides Retention and Disposal Policy.

7.3 Heads of departments and service area managers have overall responsibility for the management and compliance of records and information arising from the business of their own areas, and ensuring staff are supported to follow this policy.

7.4 The University Archivist and Records Manager supports the development and promotion of consistent records management standards, systems and processes. This support includes the provision of advice, guidance and the delivery of staff training and development.

8 Legislative Framework

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

9 Related Policies, Procedures, Guidelines and Other Resources

- UHI Records Management Policy
- UHI Retention and Disposal Policy
- UHI North, West and Hebrides Data Protection Policy
- UHI North, West and Hebrides Freedom of Information Policy
- UHI North, West and Hebrides Records Retention and Disposal Policy

10 Version Control and Change History

Version	Date	Endorsed / Approved	Amendment(s)	Author
0	Aug 23	Approved	New policy for UHI NWH	-
1				
2				
3				
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