



Information and Records Management Policy

Created by the Governance Office

Approved by Court 14 June 2023

1. Introduction

The effective management of the University's information and records is a core corporate function and fundamental to the University's success, as our information and records evidence transactions and decision-making, ensure business continuity, and compliance with relevant legislation and regulations. Our information and records are also immensely valuable as they demonstrate the longstanding, positive impact that the University makes in research, serving the public interest, and for our students and colleagues.

The Information and Records Management (IRM) Policy clearly defines the legal, compliance and accountability obligations of the University; who is responsible for meeting those obligations and the scope of the information and records covered by the Policy; and how accomplishing the effective management of our information and records this will benefit the University through waste mitigation (working towards net-zero), enhanced business continuity (improved information and record standards and better use of staff time), and the preservation of our corporate memory (championing Abertay's values and its contributions to academia and the community).

To achieve this, the University is committed to applying the resources necessary to manage its information and records effectively and achieve the benefits and legal compliance that records management will bring. This will be led by the Governance Office.

2. Purpose

The purpose of this Policy is to inform colleagues of the standards and principles of information and records management that are to be upheld by all at the University. It outlines the legal responsibilities, as well as the internal and external objectives and commitments of the University, which rely on the correct implementation of IRM. The framework for delivering this is detailed in the IRM Outline Project Plan (which will be superseded by the IRM Framework) – of which this Policy is an integral component.

This Policy also outlines the responsibilities of staff. We all share responsibility for delivering effective information and records management, and staff engagement with the Policy will ensure that everyone shares in the benefits gained.

Fundamental to the Policy is ensuring that the following objectives are met:

Legal, Compliance, and Accountability.

The University has several legal and regulatory obligations that are reliant on the effective management of information. Compliance with those obligations is dependent on the University being able to evidence decision making and demonstrate that we are protecting data, using it lawfully, fairly and transparently.

Legislation specific to information governance and record-management includes:

Information Rights laws:

Freedom of Information (Scotland) Act 2002 (FOISA)

Environmental Information (Scotland) Regulations 2004 (EIR)

Data Protection laws:

UK Data Protection Act 2018

UK General Data Protection Regulation (GDPR)

Privacy and electronic communications laws:

UK Privacy and Electronic Communications Regulations 2018

Potential Consequences

It is important to understand the serious harm that failed compliance can bring to the University.

Some of the negative outcomes that we want to avoid are:

- Legal action: this can result in costly settlements or restrictions to our activities.
- Information regulators' audit and review: the Information Commissioner's Office (ICO) is the regulatory body for Scottish Higher Education (HE) institutions on data protection legislation including GDPR. The Office of the Scottish Information Commissioner (OSIC) is the equivalent body overseeing the implementation of FOISA and Environmental Information (Scotland) Regulations (EIRs). Failure to comply with FOISA, EIRs, Data Protection Act or GDPR can result in substantial fines and closer scrutiny of our data protection and freedom of information processes.
- Reputational damage: Funders, partners, and students want to know that they can trust us to handle their information. Failure to comply with regulations, the accidental release and/or loss of confidential information, or the misuse of information is damaging to those relationships and can inhibit our success.

Mission and Strategic Objectives

The adoption of an effective information and records management system is fundamental to the University delivering on the pledges made in the [2020-2025 Strategic Plan](#). If Abertay is to be known for the **impact of our research and knowledge exchange** and for **Our Organisation to be well-run, efficient and forward-looking**, the efficient and sensible management of the University's information assets will play an integral part. By managing our information and records we will also be contributing to meeting the University's net zero targets, in accordance with the Sustainable Development Strategy 2023.

In support of the University's purpose, this Policy will ensure we:

Capture oversight of all the work and information generated and stored throughout the university. Information driven results will help champion Abertay as a great place to work, study, and partner with.

- This is to be captured by a Business Classification Scheme, an Information Asset Register, and an Information Risk Register.

Create efficient and logical systems to help manage our information and records, and facilitate internal and external collaboration and exchange, all while delivering the capability to confidently comply with our legal obligations.

- This Policy outlines the standards and principles of information and records management that are to be imbued in our IRM system. To develop and maintain an IRM system at the level required of a public institution, this Policy will be supported by clear guidance on Naming conventions, File hierarchy, Record retention, and Access controls – to be contained within the IRM Outline Project Plan (which will be superseded, the IRM Framework).

Have a robust risk management procedure, so that our partners, colleagues, and students trust that their information is being handled securely and in keeping with all relevant legal compliance. This will give new and existing partners assurance that we can be trusted with their information.

- Effective information and records management and the creation of a Risk Register will enable us to reliably identify information at risk, and this Policy will in turn support the relevant risk management procedures of the University.

Business continuity, corporate memory, and historical record

IRM plays an important role in business continuity, risk management, and maintaining the institutional memory.

Business continuity benefits from a robust information and records management system by preventing the duplication of work, enabling the efficient navigation of information, and facilitating the exchange/use of reliable information assets. It also negates the occurrence of lost or compromised information.

From a risk management perspective, effective records management enables an overview of the information generated by the University. Information can be readily identified by vulnerability and sensitivity, allowing the targeted application of established practice to better protect certain information types.

The care of our records is crucial to preserving the institutional and corporate memory of Abertay. Abertay has a unique foundation and much of what has been accomplished will go on to shape our future. It is of huge importance that the information we generate at present is reviewed and submitted to the University Archive when appropriate.

3. Objectives

The objective of the Policy is to state the standards needed to facilitate the effective oversight and management of the University's information and records. Our information and records must be identifiable, classified, accessible, and retained for the appropriate length of time and how this is going to be established.

The principles set out in this Policy, supported by the IRM Project Plan (to be superseded by the IRM Framework), will ensure that our information and records adhere to the following information and records management principles:

Effective

Effective information and records exist to fulfil a purpose. The duplication and capture of unnecessary information should be avoided. We should prevent gaps in our information, gaps that would render the information we do hold incomplete, e.g., not recording the process behind a business decision or Data Subject Rights decision.

Effective information and records are also determined by how we record information. Information should be standardised, comparable and linkable. This will allow for a greater exchange of information and allow us to maximise the value of our information.

Confidentiality

Confidential information should always be treated with vigilance and access should be limited through the application of access controls. Only individuals with a business need and authority to manage confidential data should be granted the appropriate permissions to do so.

As a guide, we should strive to have access to confidential information as closed as is necessary and as open as is possible. This equates to role-based access permissions that are promptly designated and/or rescinded in line with business needs.

Life cycle

The principal of a life cycle applies to all information. From the point of creation, through the periods of active use, semi-regular use, and finally the transfer to either the university archive or confidential disposal information must be categorised and reviewed at each stage of the life cycle. Doing so will allow the proper application of information and records management. It is important that information is not maintained for longer than is necessary since doing so increases the risk and liability attached to that information. There are clearly defined retention schedules which must be identified and followed by every business area.

Accessible

Information and records must be locatable and retrievable by appropriately authorised individuals. There must be a clear record of what information exists, who holds access, and at what stage of the life cycle this information is at (current, semi-current, archived/due for destruction).

This is particularly important when applied to data subject rights or freedom of information requests. To deliver accurate and time compliant responses we rely on there being accurate information about what information exists and where.

Authentic

Information and records can be proven to be the records that they say they are, the definitive source of truth, and provide a history to show they have not been altered without permission or due cause.

By upholding these principles, the University can be confident that the management of our information and records are:

Proportionate

This IRM Policy recognises that the management of information requires resources, and we aim to have an information and records management system that maximises the value from staff time and input. The management of our information and records should focus on delivering a balance between cost and benefit. We should prioritise our resources on managing the correct information, such as the Core Student Record, and less on information of lower significance, such as transitory business records. Where possible, automation will be utilised to deliver information and records management.

Legal

The University should manage its information in compliance with relevant legislation.

Transparent

The purpose for managing information and records and their location should be clear and transparent. All information managed by the University has the potential to be disclosed in accordance with freedom of information requests and data subject access rights requests.

Accountable

Our information and records support the decisions and activities of the University and ensure that we are accountable for them. This includes our compliance with the relevant legislative obligations.

Defined roles of accountability will be defined for each School / Service – as detailed later in this Policy.

Cost-efficient

Information and records management should be optimised for long-term value and for the systems developed to be efficient and effective. Our IRM system will be delivered through the utilisation of university supported technology and licenses (Microsoft 365 licenses, for example) in collaboration with the specialists in IT Services. Recognising that cost-efficiency will differ across the University, input from Schools / Services will be incorporated to meet bespoke needs as necessary.

4. Scope

This Policy is for the attention of all employees and individuals working or undertaking a role on behalf of the University.

It is applied to all types of information and record, regardless of format (electronic or physical), use, site of creation, storage, or content.

This Policy is not limited to information and records existent on university grounds, systems, or devices and it includes university materials created, stored or used at any location, including personal devices.

Information and records created in the course of research are subject to the contractual recordkeeping requirements of that research, but they should observe the principles detailed in this Policy. For more information, please read the [Research Data Records Management Policy](#).

5. Lines of responsibility

All University Staff are responsible for upholding this Policy. Any staff creating, maintaining, receiving, or handling information are responsible for upholding information and records management. The following lines of responsibility show the hierarchy of responsibility throughout the university. All staff should ensure they are aware of their overall role and who to go to for guidance and support, should they need to raise an information and records management issue.

The Senior Management Team (SMT) has overall responsibility for upholding the correct management of the information and records generated by the functions and activities of the Schools/ Services. More specifically, they will ensure that the information and records controlled within their area are managed in a way that meets the aims of the IRM Framework.

The Vice Principal (Strategy and Governance) and University Secretary is responsible for ensuring the University corporately meets its legal responsibilities, and internal and external governance and accountability requirements, including those related to information compliance and records management.

The Information and Records Management Group oversees and supports IRM work at the University. It will help to steer the strategic direction of IRM and provide assistance to the Governance Office where required. Its core membership will consist of Governance Office staff and key members from Schools / Services including IT Services, and Communications.

The Head of Governance and Deputy Secretary is responsible for the development of good information and records management practice and promoting compliance to ensure the efficient, appropriate, and timely retrieval/management of information. The day-to-day management and implementation of this responsibility is devolved to the staff of the Governance Office. They will report to the Head of Governance and Deputy Secretary, who in turn reports to the Vice Principal (Strategy and Governance) and University Secretary.

The Governance Office will have a co-ordinating and enabling role, including the development and maintenance of the wider IRM Framework, the production of guidance and training to assist staff in carrying out their information and records management responsibilities, and will provide advice on policy and best practice.

The Information Asset Owner(s) (IAO) is responsible for providing leadership and accountability for the management of information and records created, received, and maintained in their business areas. They are responsible for the information and records in their associated Schools / Services. They will meet the specifications outlined in the IAO and IAM Role Specification document.

The Information Asset Manager(s) (IAM) is responsible for dispersing guidance and support to members within their network. They will support their IAO and the Governance Office to deliver the IRM Policy and all related guidance and procedures. They are a crucial link between the Governance Office and the wider University, ensuring that information and records management is implemented and monitored universally.

IAMs will be identified and nominated by the IOAs according to the specifications outlined in the IAO and IAM Role Specification document. The Governance Office will assist in identifying the role holders most applicable for the IAM appointment.

6. Monitoring and evaluation

Finance and Corporate Performance Committee (FCPC) will be the Court committee responsible for providing high-level oversight of the Information and Records Management Policy. They will review and recommend any action relating to the IRM Policy and the IRM Framework to the University Court for approval.

The Senior Management Team will receive regular reports on the status and development of information and records management across the University.

Information and Records Management Group will monitor progress and consider issues raised by the Information Asset Owners and Managers network. In addition to this, the IRM Group will be responsible for overseeing the development and running of regular audits of the information and records management system to identify and address any issues, to ensure it stays fit for purpose.

The IRM Group will meet monthly and report in turn to SMT. High level reporting on information and records management will be made to SMT and as appropriate to FCPC.

The Head of Governance and Deputy Secretary will monitor the implementation of this Policy and direct the adjoining IRM Framework.

The Governance Office will support the Head of Governance and Deputy Secretary to provide advice, training and guidance to colleagues on the day-to-day basis. They will work collaboratively across the Executive, Schools / Services, and with the IAOs and IAMs to promote and develop information and records management across the University. It will be their responsibility to monitor, evaluate and act on developments in the IRM Outline Project Plan (which will be superseded by the IRM Framework).

The Governance Office will maintain a register of the appointed IAOs and IAMs and work with them to maintain coverage across the University (delivering training and guidance).

7. Supporting Policies, Procedures, and Codes of Practice

The University will seek to comply with the International Standard on records management, ISO BS 15489:1 2016 (Information and Documentation – Records Management). It will also seek to comply with other relevant documentation, such as the Section 61 Code of Practice on Records Management by Scottish Public Authorities under the Freedom of Information (Scotland) Act, 2002.

It will be guided by the Records Retention Management Guidance for HE and Further Education Institutions provided by the Joint Information Systems Committee (referred to as JISC) and co-operate with other HE institutions and other relevant public authorities to benefit from best practice within the sector.

It will also seek to comply, where possible, with relevant information and records related guidance in specific business areas of the University.

Records of specific business functions and activities within the University will also be managed under specific legislation, professional best practice, or relevant ethical guidelines. For example, management of some Human Resources records is governed by Employment Law.

The University will ensure that its IRM Outline Project Plan (which will be superseded by the IRM Framework) facilitates compliance with relevant legislation and University policies.

Policies and procedures with specific relevance to this Policy are:

Retention Procedure & Schedules

- Life cycle guidance
- Explain the increase to risk and liability through negligence in this area of RM
- Retention or archive concept

Data Protection Policy

- Outline University's responsibility as Data Controller
- Handling of personal data

Information Rights Policy

- FOISA & EIR
- Data Subject Request

Information Security Policy

- Implement a proportionate risk-based approach to information security.
- Differs to IT security, but close crossover.
- Information Risk Register

Archival Policy & Digital Preservation Policy

Research Data Management Policy

- Designed to ensure that Research data created and used within the University is managed to the same standards as all other information types.

Data Protection Impact Assessment Toolkit

- A toolkit designed to assess the necessary technical and organisational methods for gathering or using personal or confidential information.

8. [Definitions](#)

A list of definitions for technical language relating to Information and Records Management is provided by the Governance Office's **Definitions of Common Information and Records Management Language**. Please consult this document if any of the unavoidable technical language used in this document is unclear.

9. [Help and advice](#)

For additional help and support for anything related to this Policy, or an issue relating to Information Governance and Records management more generally, please contact the Governance Office via email at infosmart@abertay.ac.uk