

Records Management Policy

Version number	Date approved (including committee)	Reason for production/revision	Author	Proposed next review date
V1.4	Sept 2023 IGG	Periodic review	Business Development Director	Q1 2025-26
V1.3	Sept 2021 ExCo	Alignment with the Information Governance Framework	Registrar	Biennially and as required
V1.2	Sept 2019 ExCo	Annual review	Registrar	Biennially and as required
Related policies				
Freedom of Information Policy Employee Records Data Protection Policy Records Management Policy Data Security Policy Email Use Policy Acceptable Use of IT Policy Bring Your Own Device Policy Business Continuity Policy Staff Disciplinary Policy Student Disciplinary Policy Equality & Diversity Policy Safeguarding Policy				
External Reference				
Data Protection Act 2018 Code of Practice on the Management of Records (which is published under section 46 of the Freedom of Information Act 2000)				

1. Policy Overview and Scope

- 1.1. ICMP is committed to creating, managing and disposing of its academic and non-academic records effectively in order to document its operations efficiently and openly, as well as help to meet its accountability requirements and community expectations.
- 1.2. ICMP's record management policy, and accompanying record retention schedules bring central focus to the Company's approach towards the creation, filing, retrieval and disposal of its records. The policy is built on the premise that effective creation, control and disposal of records brings administrative and financial benefits to the Company, while promoting good practice in complying with legal obligations, particularly those established by Data Protection legislation.
- 1.3. This policy has been formulated in accordance with the Code of Practice on the Management of Records, which is published under section 46 of the Freedom of Information Act 2000, and takes account of work carried out in this area across the Higher Education sector.
- 1.4. This policy is based on the understanding that all ICMP employees are responsible for creating and maintaining authentic and reliable records in relation to their work.
- 1.5. Within the context of this policy statement, "records" refers to all documents created, received or maintained by the Company in the course of carrying out its corporate functions. These documents can be held in electronic or hard copy format.

2. Policy Aims

- 2.1. The policy provides a framework for managing the ICMP's records, and seeks to educate and assist staff across the Company in fulfilling their obligations and responsibilities in the important area of records management. It is built around a number of practical goals:
 - 2.1.1. the creation and capturing of authentic and reliable records to demonstrate evidence of accountability and information about ICMP's decisions and activities;
 - 2.1.2. secure maintenance and preservation of access to the records, as long as they are required to support ICMP's operations;
 - 2.1.3. confidential destruction of records as soon as they are no longer required;
 - 2.1.4. adherence to all legal obligations, specifically those established by the Data Protection Act 2018;

2.1.5. secure identification and archiving of records considered worthy of permanent preservation;

2.1.6. Company-wide staff awareness of all records management and related issues.

3. Responsibility for Records Management

3.1. The Information Governance Group (IGG) is responsible for the approval, maintenance and implementation of this policy alongside the . Central to this is the promotion, implementation, maintenance and monitoring of all records management activity, led by the IGG and in consultation with relevant staff across ICMP.

3.2. Responsibility for adherence to the policy (including the Data Protection obligations), lies with the heads of each of the departments, senior management responsibility for records management lies with the Academic Registrar.

3.3. On the basis of the information and guidance provided by the IGG, staff are obliged to:

3.3.1. understand and adhere to this policy;

3.3.2. ensure that records are held on the most appropriate medium for the task they perform;

3.3.3. identify those records that are vital to the operation of the Company, and ensure they are preserved appropriately;

3.3.4. review periodically records that have been identified for permanent archive;

3.3.5. dispose of and/or destroy appropriately those records that have reached the end of their retention period.

4. Records Management Framework and Implementation

4.1. Each department has in place a formal records retention schedule and a standard procedures document relating to the management and retention of each set of records relating to the core functions of that department. The retention schedule sets out how long each set of records is retained. Departments must adhere to the schedules they develop, ensuring those records reaching their disposal date are destroyed. Information assets are also fully documented on the Information Asset Register.

4.2. The IGG is responsible for ensuring that this policy is implemented effectively, and for raising awareness throughout ICMP of the existence of the policy and the

importance of compliance. Day to day responsibility for this work is exercised through the heads of each department.

4.3. Each department nominates an individual with whom the IGG liaises on all matters relating to records management. This nominee reports directly to the head of the department. Collectively, the group of nominees is known as the Records Management Network.

4.4. In liaison with the Records Management Network, each department is responsible for ensuring it has effective manual and electronic filing systems that enable timely and efficient access to data upon request.

5. Staff Training and Development

5.1. The IGG produces and maintains relevant guidance for staff in relation to Record Management and Data Protection. The guidance aims to provide employees with the skills and knowledge necessary for them to understand and adhere to this policy, and to raise awareness of the Company's legal obligations in this area.

5.2. ICMP's staff induction programme includes sections on Information Governance and Data Protection to ensure new members of staff understand the Company's legal obligations.

6. Policy Review and Audit

6.1. The Information Governance Group will review this policy periodically.

6.2. The Record Management Network (in-conjunction with IGG) will undertake periodic departmental record audits.