# Exeter College, Oxford
# Records Management Policy

## 1. Purpose

The purpose of this policy is to provide a framework for records management at Exeter College in support of good governance and in compliance with its legal, regulatory and ethical obligations. It outlines the College's approach to good recordkeeping and defines responsibilities for the control and maintenance of records and information within the College.

## 2. Background

Exeter College was founded in 1314 and is a world-class teaching organisation and institution of historic standing. Records are a vital part of the College's institutional memory, providing important historical information and representing a significant part of the educational history of the United Kingdom. They map the College's development over time, constituting a key resource for both academic research and the current administration of the College. The College is a designated public authority under the terms of the Freedom of Information Act and must comply with data privacy legislation. Both these acts and associated legislation provide enhanced rights of access to information. Furthermore, they require the College to maintain the security and confidentiality of personal data and to demonstrate compliance through transparent procedures in its handling of information.

1 Regulation (EU) 2016/679 (General Data Protection Regulation), Data Protection Act 2018

Record: '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.' ISO 15489

Recordkeeping: 'the processes and systems an organisation uses to make sure that records can be found quickly and easily and that they are preserved for as long as they are needed.' PARBICA

'Records are the life-blood of any organisation, providing evidence of actions and decisions, supporting business functions and protecting its interests and reputation as a trusted institution.' FOI Sec 46 Code of Practice on Records Management 0103.00

Managing information assets in an efficient way is critical to the operations of Exeter College and can help to save time and money by ensuring that vital information can be located and is protected against accidental or unauthorised loss or destruction. Failure to manage information increases the risk of financial and reputational losses. This policy aims to be consistent with an institution committed to excellence in teaching and research and reflects the character of the College's historic recordkeeping activities.

## 3. Scope

This policy applies to all College employees, including temporary and casual employees, and to contractors and volunteers. This policy relates to all records generated or received in the course of business which provide evidence of the functions, activities, and transactions of the College and its members. The records may be in any format or medium, including electronic documents. All records created in the course of College business are College records.

## 4. Objectives

In support of good governance, Exeter College is committed to achieving best practice in its recordkeeping activities. To do this, it aims to progressively improve its recordkeeping to comply with the International Standard on Records Management (ISO 15489). The College aims to create and maintain authentic, reliable, and useable records:

a) to comply with its statutory and legal obligations, relating to financial and environmental concerns, health and safety and contractual agreements,

b) to safeguard personal and other data and meet its obligations under the Data Protection Act 2018, the Freedom of Information Act 2000, and other legislation,

c) to provide evidence and information about policies and activities, and protect the interests of the College in interactions with stakeholders and uphold its rights and obligations towards individuals and organisations,

d) to improve working practices, for example through better retrieval of records, ensuring that staff can identify the most up-to- date and accurate information,

e) to prepare for business continuity and disaster planning,

f) to optimise storage, both physical and electronic, and contribute to the College's sustainability agenda,

g) to recognise the value of information as a corporate resource and protect it against loss or damage,

h) to identify and preserve significant records of historical value for the College and for wider research.

## 5. Records Management System

To provide the foundation of a records management system, Exeter College has already conducted a records management survey of departmental staff. This was reviewed by the Archivist and Records Manager and extended to Fellows and Academics. A set of retention and disposal schedules for each department were created by the Archivist and Records Manager, communicated to Heads of Department, and will be disseminated more widely to all relevant staff. A set of training materials on aspects of records management has been created and these will be gradually rolled out to all departmental staff, especially those that regularly handle sensitive data. Exeter College has invested in Oxford University's Digi safe, managed by Libnova network, which is a digital preservation system as part of an opt-in subscription service. Subscribing units receive access to an easy-to-use, flexible, cloud-based platform, offering storage and tools for secure, compliant data preservation.

The College will build upon its recordkeeping capacity to improve structures, processes, staff, resources, and rules to work together and to manage its records well. The records management schedules, together with training, will ensure that all members of the College:

a) create records which give an accurate and complete account of the College's activities and transactions,

b) store both hardcopy and digital records within suitable filing systems/digital preservation systems to enable easy retrieval and avoid unnecessary duplication,

c) control access to records in accordance with their level of confidentiality and importance,

d) preserve records for the correct length of time, and dispose of them securely in line with College retention and disposal schedules,

e) make accountable decisions about disposal of records no longer required for current business.

The College will work to ensure that:

f) all College members are appropriately trained and are familiar with all Exeter College policies and procedures relating to recordkeeping and management of information; specific staff who handle personal and sensitive data are given additional recordkeeping training;

g) records risks (linked to data breaches) are assessed and adequately managed; incidents are reported in a timely manner via appropriate management channels, and properly investigated and managed;

h) all relevant records management requirements of Exeter College are covered in agreements with any third-party partners or suppliers, and compliance against these is monitored and;

i) record management controls are monitored to ensure they are adequate and effective.

## 6. Responsibilities

The following bodies and individuals have specific records management responsibilities:

**The Rector** is accountable for the effective implementation of this records management policy and supporting rules and standards within Exeter College;

**The Governing Body** has executive responsibility for records management within Exeter College. Specifically, the Governing Body has responsibility for overseeing the management of the security risks to Exeter College's staff and students, its infrastructure, and its information;

**The Finance and Estates Bursar and The Fellow Archivist** are responsible for periodically reviewing this policy to ensure it is fit for purpose;

**The Archivist and Records Manager** has responsibility for developing and implementing records management schedules, practices, and training to ensure the availability, integrity, and compliance of recordkeeping within the College;

**The IT Manager** has responsibility for implementing and managing the IT technical controls and ensuring that third party partner or supplier agreements are in place;

**Heads of Department** are responsible for ensuring that recordkeeping practice within their department conforms to the requirements of this policy, so that all staff within their department know about, understand, and comply with this policy, ensure that staff receive suitable recordkeeping training; so, recordkeeping procedures are reviewed and updated, as necessary.

**All staff** are responsible for creating and maintaining accurate records and complying with recordkeeping policies and procedures.

## 7. Compliance

The College regards any breach of this policy as a serious matter, which may result in disciplinary action.

## 8. Review and Development

This policy, shall be periodically reviewed by the Archivist and Records Manager, alongside the Finance and Estates Bursar and Fellow Archivist and approved by the Governing Body to ensure that it:

- remains operationally fit for purpose;
- reflects changes in technologies;
- Is aligned to recognised best practice; and
- support continued regulatory, contractual, and legal compliance

This Records Management Policy should be read in conjunction with the following College policies on

- Data Protection Policy
- Digital Preservation Policy
- Information Security Policy
- Information Security Incident Management Policy
- Mobile Device Security Policy
- Departmental Retention and Disposal schedules

By College Order 24/022 this policy was approved by Governing Body on 6th March 2024 with effect from 1st April 2024, and is to be reviewed by 31st December 2027, and was also approved for display on the website.