# Records Management Policy

**Policy Number:**
075-2023

**Academic Year:**
2025/26 Onwards

**Target Audience:**
All Staff, Students and Third Parties

**Summary of Contents**
Summary of Records Management obligations

**Enquiries**
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**Review Information (Responsible Owner):**

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Lead GB Committee: Finance & GP

Governing Body Approval: April 2026

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Data Protection Policy
Freedom of Information Policy

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## 1.0 Change History

Changes to this SOP are documented in Appendix 1 of this document. When reading electronic copies of this document, you can click here to view the change history.

## 2.0 Introduction

SERC's compliance with the Data Protection Act (2018), UK GDPR, Freedom of Information Act (2000) and Environmental Information Regulations (2004) can only be efficient if there is sufficient time and resources in creating an organised information governance system.

Information is a vital asset, both in terms of the delivery of teaching and learning and the efficient management of services and resources. The College is committed to creating, managing and disposing of its academic and non-academic records effectively ensuring the operational needs are met, as well as for purposes of accountability. Good records management will allow the College to satisfy statutory obligations and audit requirements by managing and preserving the records that serve these aims. This will reduce the risk of records being lost, damaged or accessed by unauthorised personnel.

The College is committed to ensuring that the records it produces are managed effectively from the point of creation to their ultimate destruction or transfer to permanent preservation. An approved records management system reduces the risk of records being lost, damaged or accessed by unauthorised personnel. In addition, effective records management is an efficient management of College resources, helping to reduce costs, avoid wastage and improve retrieval rates in response to Subject Access and Freedom of Information requests.

## 3.0 Scope and Definitions

Records are defined as "recorded information created, received, and maintained as evidence and as an asset by an organisation or person, in pursuit of legal obligations or in the transaction of business." [BS ISO 15489-1:2016].

Records management is defined as the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

This policy applies to all records created, received or maintained by staff in the course of carrying out their responsibilities.

This policy will ensure compliance with the Freedom of Information Act and Data Protection legislation and will be subject to any changes in legislation.

## 4.0 Aims

This policy will provide a framework for managing the College's records in accordance with the FE Sector Retention and Disposal Schedule. Its aim is to advise and assist staff across the College in fulfilling their responsibilities and obligations in the important area of record management. It is based on a number of practical aims:

- demonstrate and evidence the filing and disposal of records to evidence accountability;
- secure maintenance and access to records;

- Minimise the risk of breaches and inappropriate use of personal data;
- confidential destruction of records as soon as they are no longer required;
- adherence to all legal obligations;
- secure identification and archiving of records;
- College wide staff awareness of all records management and related issues.

## 5.0 Legal Obligations

As a public authority the College must manage its records in accordance with Acts of legislation. The Information Commissioners Office (ICO) regulates the application of these Acts and will take action where a breach occurs.

The Public Records Act (NI) (1923)

The Public Records Act (1923) established The Public Record Office of Northern Ireland (PRONI) as the place of deposit for public records, creating the roles of Keeper and Duty Keeper of the records as well as defining what public records actually are.

Disposal of Records Order (1925)

The Disposal of Records Order (1925) sets out how PRONI and government departments should deal with the disposal of public records once their business need comes to an end. Records management is ultimately a matter of risk management, and the College must control the risks associated with the retention and disposal of records. The ICO and PRONI require the College to develop an NI Assembly approved Retention Schedule which identifies the classes of information held, how long the record is to be archived and retained and what the final action will be e.g. destroy, transfer for permanent preservation.

The majority of records created by the College do not have sufficient importance to warrant permanent retention and must be destroyed at specified times. The destruction of any record must only be carried out after it has been assessed for legal, administrative or archival retention requirements. The College retention periods are outlined in the FE Sector Retention and Disposal Schedule.

Freedom of Information Act (2000)

The Freedom of Information Act (2000) covers any recorded information i.e. printed documents, computer files, letters, emails, photographs, sound and video recordings held by the College, with the exception of environmental information. The main principle behind FOI is that the general public have a right to know about the activities of public authorities unless there is a good reason for them not to. Information may only be withheld if there is an absolute exemption or the public interest test considers that the public interest in maintaining a qualified exemption outweighs disclosure.

The College has a legal obligation to provide information through an approved publication scheme and in response to requests. The College must respond to a request within 20 working days. Further information is available in the Access to Information Policy.

Publication Scheme

The College must produce a "Publication Scheme" which lists classes of information about activities which are in the public domain and which the College has published or intends to publish. In this context, "publish" means to make information routinely available. It must also make clear how the information described can be accessed. The Publication Scheme is available on the College website.

Lord Chancellor's Code of Practice on the management of records issued under Section 46 of the Freedom of Information Act (2000)

Section 46 of the Freedom of Information Act (2000) states that the Lord Chancellor will issue "a Code of Practice providing guidance to relevant authorities as to the practice which it would, in his opinion, be desirable for them to follow in connection with the keeping, management and destruction of their records."

Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000 (publishing.service.gov.uk)

Environmental Information Regulations (2004)

The Environmental Information Regulations (2004) (EIR) require public authorities to take reasonable steps to organise and keep up to date the environmental information it holds, and which is relevant to the public authorities function. It gives members of the public the right to access 'environmental information' held by public authorities. The College must respond to a request within 20 working days.

Data Protection Act 2018 / UK GDPR

Under DPA 18 / UK GDPR the College is a registered Data Controller and is registered with the ICO, Registration Number Z6477199. The College is required to process and safeguard all personal data in accordance with the 6 principles set out in UK GDPR. Under Article 5(1)(e) of the UK GDPR, the College must not keep personal data for longer than necessary. Data should be periodically reviewed and data that exceeds the retention period will be unlikely to have a lawful basis for processing. This is also known as the 'Storage Limitation' Principle.

The College recognises the importance of protecting its information assets and, in particular, the information relating to its staff, students and other individuals in whatever form that information is held.

## 6.0 Responsibilities

The Records Manager is responsible for the development and maintenance of policies and guidance relevant to records management and information governance.

On the basis of information and guidance provided staff are obliged to:

- understand and adhere to policies relevant to their work;
- ensure that records are held on the most appropriate medium for the task they perform;
- identify those records that are vital to the operation of the College and ensure they are retained for the appropriate timescales;
- review periodically records that have been identified for archive;
- dispose of and/or destroy appropriately those records that have reached the end of their retention period;
- retain an audit log for the filing and disposal of records.

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## 7.0 Records Management Framework

Each department should have a formal records management process relating to its management and retention of records relating to the core functions of that department. The FE Sector Retention and Disposal Schedule outlines how long each set of records must be retained. All records must be disposed of in line with the Retention and Disposal Schedule, any divergence must be for legitimate reasons.

Each department has a nominated individual with whom the Records Manager can liaise on all matters relating to records management. In liaising with the Records Manager, each department is responsible for ensuring it has effective manual and electronic filing systems that enable timely and efficient access to data upon request.

Information must not be retained for longer than is necessary and timeframes for retention periods is detailed in the FE Sector Retention and Disposal Schedule. Once the retention period has elapsed, the Department will arrange to destroy the information by secure means.

## 8.0 Monitoring Compliance

Records Management is included in the corporate risk management framework. Information and records are a corporate asset, the loss of which could cause disruption to business or regulatory fines.

The Records Manager will conduct annual audits the retention of records as part of Information Governance. Records Disposals Form will be subject to an audit and quarterly report to management on audit findings.

## 9.0 Review

This Policy will be reviewed (and if necessary updated) biennially or sooner if required to reflect changes in legislation or circumstance.

## 10.0 Responsible Owner

It is the responsibility of Records Manager to ensure that this policy is implemented, adhered to and reviewed.

## 11.0 Communication Plan

This Policy will be uploaded to the College intranet and referred to in staff induction and training.

## 12.0 Review

This Policy will be reviewed annually, or when the need for change has been identified.

## Appendix 1: Document Change History

| Version | Date | Change Detail |
|---|---|---|
| **1.0** | July 2023 | Transferred to new Accessibility Template |
| **1.1** | February 2024 | Reviewed and no changes are necessary |
| **1.2** | November 2024 | Cover sheet updated |
| **1.3** | May 2025 | No Changes required |
| **1.4** | March 2026 | No Changes required |
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