UNIVERSITY OF WESTMINSTER

University of Westminster

Records Management Policy

Published by: University Records and Archives

Information Category: Public

Version Record

Version	Date	Author	Description
6.0	June 2026	C Brunnen – Senior Digital Archives and Records Management Specialist	Approved by Information Governance Advisory Group
5.0	June 2023	C Brunnen – Senior Digital Archives and Records Management Specialist	Approved by Chair of Information Governance Advisory Group
4.0	November 2019	R. Short – Senior Records Manager	Approved by University Executive Board
3.0	February 2018	R. Short – Senior Records Manager	Approved by University Executive Board
2.0	May 2014	R. Short – Assistant Records Manager	Approved by University Information Governance Group
1.0	2009	M. Bacon – University Records Manager	Approved by Information Strategy Committee

Digital Accessibility

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1. Introduction

1.1 The University recognises that records contain information that is a unique and invaluable resource and an important corporate asset.

1.2 The University recognises that managing these records is fundamental to enabling the organisation to carry out its activities and by doing so ensures that the right information is:

- Captured, stored, retrieved and destroyed or preserved according to business need and regulatory and legislative requirements;
- Fully exploited to meet current and future needs, and to support change;
- Accessible to those who need to make use of it; and
- That the appropriate technical, organisational and human resource elements must exist to make this possible.

1.3 This policy and supporting documentation relating to the implementation of this policy will be made public where appropriate.

1.4 This policy will be reviewed every three years by University Records and Archives for presentation to IGAG and once agreed, recommended to University Secretary and Chief Operating Officer for final approval. It is then presented to UEB for information.

2. Scope

2.1 This policy covers the requirements necessary for all University records to be managed to ensure that they are authoritative evidence of University activity, and therefore possess the characteristics of reliability, authenticity, usability and integrity.[1]

2.2 This policy covers the requirements for systems, applications and processes that deal with the University's records, to ensure that they support the authoritative nature of records. This includes those managed by third parties on behalf of the University. Third party agreements of this nature should ensure such arrangements comply with this policy.

2.3 This policy applies to information held in records in all formats, including paper and digital formats, created in the course of the University of Westminster's business.

2.4 This policy applies to all individuals employed by the University, in any capacity, including third parties contracted on the University's behalf. The policy also covers subsidiaries that are wholly-owned by the University.

2.5 Records created in the course of research, whether internally or externally funded, may in addition be subject to contractual and academic record-keeping requirements. All research outputs are subject to the University's Research Data Management Policy[2]

3. Managing records – principles and process

3.1 Standards

[1] See Appendix A for further detail on the characteristics of authoritative records.
[2] For further information please see the University of Westminster Research Data Management Policy https://www.westminster.ac.uk/research/research-data/research-data-management-policy

Where practicable, records will be managed with reference to the following record-keeping standards:

- *BS ISO 15489-1:2016 Information and documentation — Records management*
- *The Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000.* [3]

3.2 Legislation and Regulation

All records will be managed in accordance with any legal and regulatory requirements. Particular reference will be paid to the University's obligations with regards the following:

- *Further and Higher Education Act 1992* - the requirement to evidence that an award is based on completion of an appropriate course of study and assessment. To do so requires authoritative records of that activity as evidence.[4]

See Appendix B for a non-exhaustive list of other legal and regulatory obligations.

3.3 Creation and use of records

- Records created by staff as part of their role at the University are University records.

- Each functional unit within the University should have processes in place to document its principal activities adequately, ensuring the authoritative nature of the records. There must be a clear allocation of responsibility for this within functional units.

- Records should be managed in a way that meets business, regulatory and legislative requirements. Records that are no longer needed for current business purposes, but which need to be retained should be stored in a way that ensures efficient use of time, money, people and space. The University will ensure it makes best use of its off-site storage provision for paper records and its dedicated digital records preservation storage in this context.

- Records should be kept securely and protected from non-authorised disclosure, irrespective of format. Records must be made available as widely as possible within legal and statutory limitations.

- All records, irrespective of format, must be organised logically so that they can be easily retrieved and disposed of over time.

- Records should be reviewed by staff at regular intervals, at least annually. Line Managers should ensure that when an employee leaves, responsibility for their records is transferred and any out of date information is disposed of.

3.4 Disposition of records

[3] https://www.gov.uk/government/publications/code-of-practice-on-the-management-of-records-issued-under-section-46-the-freedom-of-information-act-2000

[4] The Higher Education and Research Act 2017, established the Office for Students (OfS) and UK Research Innovation (UKRI) as the new funding and regulatory authorities for HEI's. The University's core record keeping obligations remain specific to the FHEA 1992, the relevant elements of which have not been superseded by the HERA 2017.

- Records should not be retained for longer than they are needed and should be disposed of in line with business need, University Policy, and relevant legislation, regulation and best practice.

- Disposition, (the retention, destruction or transfer), of records is controlled by retention guidance and schedules, agreed by University Records and Archives and business owners. In addition to bespoke guidance, the University predominantly uses the *Jisc 2025 Business Classification Scheme and Records Retention Schedule* to inform its retention decisions.[5] Records should never be removed or destroyed unless done so in line with retention advice provided by University Records and Archives.

- Third parties processing or holding University records must always be bound by a contractual clause, as the University directs, to either destroy or return University records on termination of any service contract.

- Some records, such as records created as a result of receiving grant funding, may be subject to specific external record-keeping requirements, including retention, disposal and transfer requirements.

- A small percentage of records will be selected for transfer to the University Archive for permanent retention in order to maintain institutional memory and accountability. Selection decisions are made by University Records and Archives in consultation with Business Owners.[6]

- All records created by senior staff members are automatically transferred to University Records and Archives for review and appraisal when that senior staff member leaves the University. This covers records in all formats including, but not limited to, email, calendar and other records held in the M365 environment[7]

3.5 Records Systems

- All records held in University systems are University records.

- All records created by staff as part of their role at the University should be captured into an appropriate records system.

- Records systems should meet the ISO15489 characteristics for record systems, to support the authoritative nature of records. Records systems should be reliable, secure, compliant, comprehensive and systematic.

- Records systems may be designed specifically to manage records or may be systems designed for other business processes but must be adapted so that they also support the creation, capture, migration and management of records.

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[5] Jisc, 2025 Business Classification Scheme and Records Retention Schedule https://www.jisc.ac.uk/guides/records-retention-management

[6] For more information please see the University of Westminster Archive Collection Acquisition and Development Policy v2.0, 2025, https://blog.westminster.ac.uk/recordsandarchives/archivepolicydocuments/

[7] See Appendix 1 of the *University of Westminster Archives Collection Acquisition and Development Policy,* v2.0, 2025

- Where a records system is being decommissioned or superseded, migration of information must be fully considered and documented to ensure the integrity of the record. Provision must also be made to retain data for the length of time set out in any retention policy.

- The University has several core records systems that are designed to meet its key legislative and regulatory obligations and these must be managed in line with this policy.

4. Responsibilities

4.1 The University has a corporate responsibility to maintain its records and records systems in accordance with the legal and regulatory environment.[8] As a member of the University's Executive Board and Senior Information Risk Owner (SIRO), the University Secretary and Chief Operating Officer has overall responsibility for this policy.

4.2 University Records and Archives is responsible for working with staff to ensure that there is consistency in the management of records and that advice and guidance on good records management practice is provided and training, where necessary, is made available.

4.3 All Line Managers are responsible for ensuring that records and systems containing records in their areas are managed in a way that complies with this policy.

4.4 Committee Secretaries are responsible for ensuring that a full record of a committee's business (its minutes, agenda, and all supporting papers) are suitably managed and preserved to form part of the formal University record. This is a legal requirement for the statutory committees (i.e. Court of Governors and Academic Council) and best practice for others (University Executive Board).[9]

4.5 All staff must ensure that the activities they are responsible for are adequately documented, and that the records they are responsible for are authoritative evidence of activity and managed in line with this policy.

5. Relationship to other policies and processes

5.1 This policy relates to, but is not restricted to, the following:

- University Personal Data Protection Policy;
- University Freedom of Information Policy;
- University of Westminster Archive Collection Acquisition and Development Policy;
- Acceptable Use Policy;
- University of Westminster Research Data Management Policy;
- University of Westminster Archive Digital Preservation Policy;
- University of Westminster Open Access Policy

5.3 This policy facilitates compliance with the University's obligations under the Freedom of Information Act 2000 and the Data Protection Act 2018 and UK GDPR.

[8] See Appendix B for a non-exhaustive list of other legal and regulatory obligations.
[9] For further information see *Process for the Management of University Senior Committee Records,* 2019, https://www.westminster.ac.uk/sites/default/public-files/general-documents/2019%20Senior%20Committees%20records.pdf

5.4 This policy provides the framework for the following:

- University of Westminster retention schedules and guidance
- Records management training information and guidance
- University records transfer processes and guidance

Next Review Date: June 2029

Appendix A – Definitions

Disposition – the range of processes associated with implementing records retention, destruction or transfer decisions which are documented.
BS ISO 15489-1 2016 Information and documentation — Records management.

Record(s) – information created, received and maintained as evidence and as an asset by an organization or person, in pursuit of legal obligations or in the transaction of business.
Records should have the following characteristics:

- Authenticity: An authentic record is one that can be proven to: a) be what it purports to be; b) have been created or sent by the agent purported to have created or sent it; and c) have been created or sent when purported.
- Reliability - A reliable record is one: a) whose contents can be trusted as a full and accurate representation of the transactions, activities or facts to which they attest; and b) which can be depended upon in the course of subsequent transactions or activities.
- Integrity - A record that has integrity is one that is complete and unaltered. A record should be protected against unauthorized alteration. Policies and procedures for managing records should specify what additions or annotations may be made to a record after it is created, under what circumstances such additions or annotations may be authorized, and who is authorized to make them. Any authorized annotation, addition or deletion to a record should be explicitly indicated and traceable.
- Usability - A useable record is one that can be located, retrieved, presented and interpreted within a time period deemed reasonable by stakeholders.

BS ISO 15489-1 2016 Information and documentation — Records management.

Records Management – field of management responsible for 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. *BS ISO 15489-1 2016 Information and documentation — Records management*.

Records Systems
An information system which captures, manages and provides access to records over time. A records system can consist of technical elements such as software, which may be designed specifically for managing records or for some other business purpose, and non-technical elements including policy, procedures, people and other agents, and assigned responsibilities. Records systems should have the following characteristics:

- Reliable – Capable of continuous and regular operation
- Secure – measures such as access controls, monitoring, agent validation and authorized destruction to prevent unauthorised access, alteration, concealment or destruction of records. Activity should be documented in metadata.
- Compliant – Systems should be compliant with business requirements, and the legal and regulatory environment
- Comprehensive – They should be capable of managing records of the range of business activities to which they relate. They should be capable or managing records created using the range of technologies in the area of business activity to which they relate
- Systematic - The creation, capture and management of records should be systematized through the design and routine operation of records systems, and by adherence to authorized policies and procedures

BS ISO 15489-1 2016 Information and documentation — Records management.

Senior Staff – Senior staff refers to the senior management levels of the University, including the following roles: Vice-Chancellor and President, Deputy Vice-Chancellor, Pro-Vice-Chancellor/Head of College, University Secretary and Chief Operating Officer and Directors of Professional Services (including those in interim or acting-up positions).

Appendix B – Relevant Legislation and Regulation

This is a non-exhaustive list

Further and Higher Education Act 1992
Freedom of Information Act 2000
Data Protection Act 2018 and UK GDPR
Taxes Management Act 1970
Limitation Act 1980
Value Added Tax Act 1994
Equality Act 2010
Health and Safety at Work Act 1974

Statutory Sick Pay (General) Regulations, 1982
Statutory Maternity Pay (General) Regulations, 1986
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, 1995
Working Time Regulations, 1998
Income Tax (Pay As You Earn) Regulations, 2004
Control of Substances Hazardous to Health Regulations
Hazardous Waste (England and Wales) Regulations 2005
Control of Asbestos Regulations 2012
Electricity at Work Regulations 1998
Regulatory Reform Fire Safety Order 2005
Energy Performance of Buildings (England and Wales) Regulations 2012
Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
Health and Safety at Work Regulations 1999
Health and Safety (First Aid) Regulations 1981
The Control of Noise at Work Regulations 2005
Health & Safety (Display Screen) Equipment Regulations 1992

UKVI – Sponsor guidance appendix D: keeping records for sponsorship, July 2018
VAT Notice 700/21: keeping VAT records
HSE Code of Practice - Legionnaires' disease: The control of Legionella bacteria in water systems (L8)