Imperial College London

Estates Development & Projects

Record Keeping Guidance

Incorporating Divisional Records Management Policy

REVISION 1.1

Issue Date 01/2019

Document History

Revision History

Revision Number	Revision Date	Summary of Changes
Rev 1	November 2016	Final draft completed for sign-off
	Feb 2017	Minor updates made to project filing schedule and format corrections Addition of section 1.1 Project Filing Responsibilities
Rev 1.1	Jan 2019	Updated to include reference to GDPR, updating associated weblinks

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Part 1 Record Keeping Introduction and "How to"

Records Management is the process by which an organisation manages all aspects of its records, regardless of format or media type, from their creation through to eventual disposal.

Good recordkeeping supports the aims and objectives of Imperial College through the provision of accountable information to facilitate operational efficiency, cost reduction and funding opportunities. The College's records are a corporate asset and are vital for:

- Supporting the divisions' current and future operations
- Meeting legislative requirements such as Data Protection, Freedom of Information and Environmental Information regulations.
- Accountability through providing reliable evidence of decisions and transactions.
- Transparency, protecting the reputation of the Division and the College.
- Raising awareness and understanding of the organisation's history and procedures.
- Ensuring business continuity through the management and protection of vital records.
- Protecting the interests of the college and the rights of all College stakeholders.

ALL staff[1] and consultants working with the division who create, receive and utilise records during the course of their work have a responsibility towards records management.

The first section of this document provides recordkeeping guidance and clarification of the processes used by the Division to manage its records including:

- Project filing
- Divisional filing
- Records of cultural or historical value to the College

The Estates Development & Projects' (EDP) Records Management Policy has been implemented to ensure ongoing improvement of its records management functions. This policy applies to all divisional staff and will benefit the Division through:

- Better use of physical and server space
- Better use of staff time
- Improved control of information resources
- Protection of vital records
- Compliance with legislation and standards
- Improved collaborative working

The College Archives and Corporate Records Unit (ACRU) are responsible for the overall standards of practice in the management of records throughout Imperial College London. This policy document aligns with ACRU guidance and should be read in conjunction with their policies and recommendations[2].

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[1] The definition of "staff" includes temporary contracts or consultants working on behalf of the College.

[2] ACRU Guidance – www3.imperial.ac.uk/recordsandarchives/recordsmanagement

Specific policies and procedures documented elsewhere in the College are also referenced in this policy to refer to for further information.

1 Project filing

1.1 Responsibilities

The Project Manager holds primary responsibility for populating the project filing throughout the duration of the project and defects period with the appropriate project related documents Items required for retention after project completion are highlighted on the Project Filing System in <mark>YELLOW</mark>. (refer to Diagram 2 below)

ALL staff creating or receiving project related records should use the project filing system. This includes but is not limited to, the Project Manager (internal and external), Senior Supplier, Project Assurance Team, Engineering Team, Space Team, Finance and Procurement.

All project related correspondence and files must be referenced with the project code and title.

Electronic file naming conventions should be taken into consideration (refer to Section 3 of this document)

1.11 Projects run by external Project Managers

Project filing deliverables are outlined in the Project Manager Scope of Services and must be saved in the College's designated filing system on a regular basis throughout the project. Refer to Section 4 of this document for information on collaborative digital filing.

The Senior Supplier is responsible for ensuring all internally generated forms (such as project brief, PID) are included in the project filing.

Externally generated records are the responsibility of the project manager and should be correctly named and saved in the project file before distribution.

The project manager is also responsible for ensuring that any project records highlighted in <mark>yellow</mark> on the project filing schedule, which are generated or saved on external Document Management systems, are extracted and saved in the Estates Division's Project Filing system.

Note also that correspondence constitutes a record and copies of any emails which provide evidence of decisions made or transactions carried out must also be saved in the Estates Division's Project Filing system.

1.2 Set up of new project file

Project files are created to manage project related documentation. A standardised process has been established to assist the Division to work effectively and provide accountable records in a format suited for medium term retention, to meet legislative requirements.

A project number should be registered and filing set up as soon as records are being created. This should not wait until the project is approved, as early stage records can hold vital evidence and as such should be retained in a managed system.

The Records and Archives Officer will create a standard set of project filing folders from the information provided at registration, consisting of:

- An electronic project file in the Divisions Shared Drive (X:) under 'Project Filing'.
- A hard copy file for any project paperwork.
- An Oasys Mail Manager 'collection' link to allow emails to be filed

Access to the Project File will be made available to ALL individuals in the Division, the appointed Project Manager and other College staff connected to the project, upon request.

The project will also be registered on the College Archives and Records Management database REMAS to provide an audit trail on project information. The inventory reference number will be added to the project file label (refer to Diagram 1).
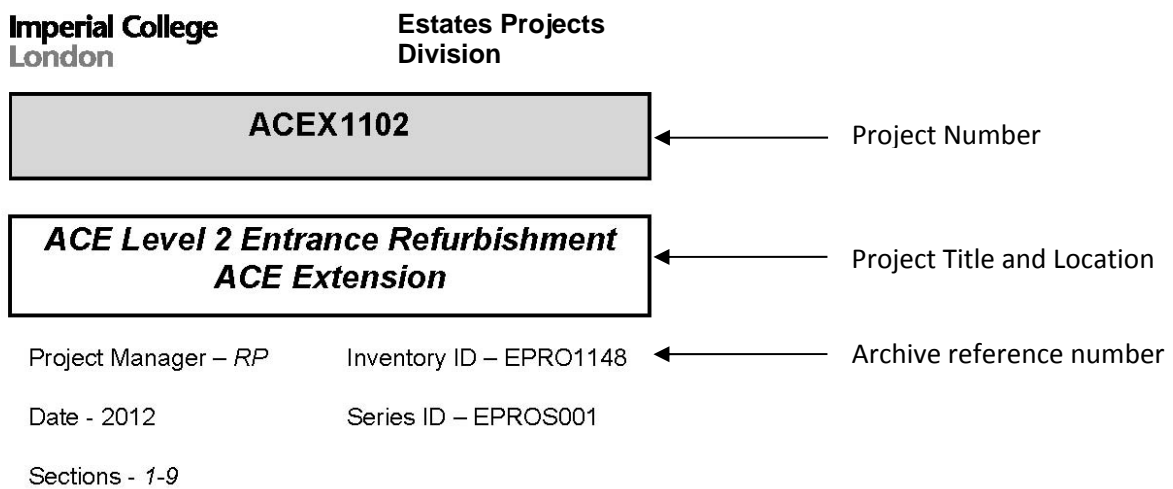
Imperial College London   **Estates Projects Division**

ACEX1102	◄── Project Number

ACE Level 2 Entrance Refurbishment ACE Extension	◄── Project Title and Location

Project Manager – *RP*   Inventory ID – EPRO1148 ◄──────── Archive reference number

Date - 2012   Series ID – EPROS001

Sections - *1-9*

Diagram 1 – Project File Label

The Records and Archives Officer sends a notification email to the Project Manager, Estates Projects Division, Procurement and Finance Teams to advise that the project file is available for use.

Additional files or storage for hard copy information can be created upon request.

1.3 Project File Structure

The filing is structured around nine functions and utilising a standardised folder structure. Refer to the Project Filing System schedule (Diagram 2). Sub-folders can be added by the Project Manager where required on a project-by-project basis, taking care to limit the length of folder names (refer to Appendix iii File Naming Protocol).

Project Filing System

1.0 Project Management
- 1.01 Programme
- 1.02 PEP
- 1.03 Value Management
- 1.04 Risk Management
- 1.05 Change Control (F.5)
- 1.06 PM Instructions (F.38)
- 1.07 Early Warnings (F.33, F.34)
- 1.08 Compensation Events (F.35-37)
- 1.09 Handover Plan (F.32)
- 1.10 Final Accounts (F.13)
- 1.11 SWMP
- 1.12 Reports (F.31)
- 1.13 Non-email Correspondence
- 1.14 AICW
- 1.15 Project Directory (F.15)

2.0 Email

3.0 Appraisal & Approval
- 3.01 Business Case
- 3.02 Feasibility (PM.03)
- 3.03 Brief (PM.01)
- 3.04 PID (PM.02)
- 3.05 Capital Approval Board
- 3.06 Next Stage Plan
- 3.07 TAG
- 3.08 Insurers
- 3.09 National Bodies
- 3.10 Utilities
- 3.11 Public Consultation
- 3.12 Local Authority
- 3.13 1851 Commission

4.0 Cost Management
- 4.01 Cost Plan (F.44)
- 4.02 Cost Reports (F.45)
- 4.03 Invoices
- 4.04 Purchase Orders and Quotations
  Project Cost Spreadsheet.xls

5.0 Meetings
- 5.01 Client
- 5.02 Project Manager
- 5.03 Design Team
- 5.04 Principal Designer
- 5.05 Enabling Works
- 5.06 Main Contractor

6.0 Design
- 6.01 Specifications
- 6.02 Surveys
- 6.03 Drawings
- 6.04 Photographs
- 6.05 Design Stage Reports
- 6.06 Specialist Reports
- 6.07 Room Data Sheets

7.0 Procurement
- 7.01 Tender
- 7.02 Appointments/Fees
- 7.03 Novation
- 7.04 Contract
- 7.05 Procurement Strategy
- 7.06 Approved Supplier Scoring

8.0 Construction Operations
- 8.01 Site Surveys/Investigations
- 8.02 Asbestos (F.2)
- 8.03 Decant Contractor
- 8.04 Enabling Works
- 8.05 Demolition
- 8.06 Main Contractor
  Supervisors
  Technical Submissions (F.41)
  Risk/Method Statements
- 8.07 Engineering Inspections
- 8.08 BEMS
- 8.09 Metering
- 8.10 Fire
- 8.11 Testing and Commissioning
- 8.12 Handover & Completion (F.14, F.39)
- 8.13 Manuals
- 8.14 Defects (F.6, F.9)
- 8.15 Post Project Review
- 8.16 Post Project KPI

9.0 Health & Safety
- 9.01 H&S Plan
- 9.02 HSE Notification
- 9.03 H&S Reporting (F.49)
- 9.04 CDM Notification (F.3, CDM Reports)
- 9.05 Safety Induction (F.4, F.17)

10.0 BIM (electronic filing only)

11.0 Incoming for Approval
(electronic filing only)

Indicates documents retained for archive at **project completion**

Diagram 2 – Project Filing System

1.4 Tender and Contract Documentation

Tender and Contract documentation contain confidential and business sensitive information and must be stored in an access restricted location.

Electronic copies of the data are uploaded to a Procurement folder on the X:drive, accessible only to divisional staff. Hard copies and electronic storage media are stored by the Records and Archives Officer in a secure cabinet and logged on the ReMAS records database.

1.5 Archive

Project Files will be closed and archived on issue of the Project Closeout form (F13). The Records and Archives Officer will issue an email notifying of the project file closure. If a Project Manager requires an extension of time for business or on-going defects issues they are to notify the Records and Archives Officer as soon as possible.

Project Managers must ensure that all project filing saved elsewhere is transferred to the Records and Archives Officer by project handover and a final transfer of post-completion records will be instigated upon notification of the Project Closeout.

The Records and Archives Officer will sift the project file, retaining the items highlighted in yellow on the schedule to prepare for archive accordance with the College Retention Schedule *(refer to Appendix)*.

All documents to be retained, as highlighted in yellow on the project filing schedule, are registered on the REMAS records management system and a transfer number is allocated by ACRU. This transfer number will be used to reference the archived documents and will remain with those documents through their retention period to destruction.

This process ensures the College can provide access to information under the Freedom of Information Act (FOIA) 2000 retained to comply with existing legislation.

1.6 Retention

Project Files have three retention periods to meet with relevant legislation

- 6 years - Project documents (See Project Filing System)
- 12 years - Contract and Tender documents
- Permanent - Planning Permission, Licence for Alteration and Completion Certificates

The Review/Destroy date calculated from the end of defects period and the transferred records are labelled with this date

Responsibility for transferred files is then managed by ACRU.

During the retention period project filing can be retrieved on request by contacting the Records and Archives Officer.

Project Files that have reached or exceeded their stated retention period will be destroyed as there is no legal requirement to retain this information beyond those dates. All records scheduled for destruction will be documented by the Records and Archives Officer and an authorisation to destroy will be obtained from the Director of Estates Development and Projects before any action is carried out.

2 Divisional Filing

Each division is responsible for filing and retaining operational information required by the College to meet a number of College policies and wider legislation.

The Records & Archives Officer is responsible for the records management processes for all records held within the Estates Operations Division, to ensure that retention of the items stated within the College Retention Schedule is applied. Each member of staff is individually responsible for the retention of records they create and receive in line with these requirements.

2.1 Definition

Divisional filing consists of all business and divisional social records created, received and stored by EDP staff which is not related to a specific project. A section of the X:drive is allocated for Divisional filing, broadly divided into business activities and processes, allowing all staff members to save and access non-project related divisional records. The X:drive should not be used for filing personal records.

Storing records by business activity or function enables consistency, reduces duplication and enables all staff to identify and quickly retrieve the information they need.[3] Some business functions may resemble specific roles and departments within the College; but whilst the names roles may hold primary responsibility for such files, they may be used and held by other staff or Divisions (for example HR files). Examples of typical records categories include:

- HR
- Training
- Health & Safety
- Administration
- Communications
- Social Activities
- Photographs

The structure will be reviewed on a regular basis through a series of consultations and workshops arranged by the Records and Archives Officer with Estates Operations to ensure that the structure remains relevant and usable for all staff.

Sub-folders can be created within the folder structure by staff. The folders should have meaningful titles relating to the content and/or function and not be titled according to the name of the folder creator. This is to ensure that the content remains meaningful in the future, after the records creator may have left the division. Refer to Appendix iii: File Naming Protocol for guidance on suitable file names

Security controls can be applied at top level folders through the implementation of distribution lists by ICT. Contact the Records & Archives Officer or the PA to the Director of Estates Projects to arrange this.

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[3] Functional classification is identified as records management best practice by BS ISO 15489-1:2016 Information and Documentation – Records Management. Section 9.4

2.2 Emails

Emails are as much an official communication as a letter, memo or fax and as such constitute College records which should be managed accordingly.

Electronic messages can be legally binding and may be disclosed in response to a Freedom of Information or Data Protection Request. The sender or the College may be held liable for defamatory statements in emails and care should be taken not to say anything that would not be said in another form of written communication.

If an email contains business related information, it should be added to the relevant folder on the shared drive.

2.3 Archive and Retention

The Records & Archives Officer will periodically review the information retained to ensure that the required items are being held no longer than required.

Documentation required to be retained by the division is listed within the College Retention Schedule. The retention schedule provides
- A list of items required
- Guidance on the retention period for each item
- The responsible division/department/individual

The Records and Archives Officer will discuss with the relevant staff member or team the continued requirements of older files. The documentation will then be sifted and listed; then retained or destroyed as per the guidance provided in the Retention Schedule *(refer to Appendix iv)*. Where appropriate the files and documentation will be transferred to ACRU.

All documents to be retained are registered on the ReMAS records management system. A Transfer number allocated by ACRU which will be used to reference the archived documents through their retention period to destruction.

This process ensures the College can provide access to information under the Freedom of Information Act (FOIA) 2000 retained to comply with existing legislation.

3 File Naming Protocol

Electronic filing enables the use of search functionalities to quickly find accurate and up to date information, so it is essential that information can be easily identified and retrieved.

Consistency in how we name documents, emails or folders is key to ease of identification and naming records logically distinguishes similar records from one another at a glance and aids with version control.

In general a title should be:

- Descriptive – it says what the document is about
- Helpful – it distinguishes the document from others of a similar topic.
- Consistent – if follows standard conventions
- Concise – file names should not be too long.

. General recommendations:
- File names should be unique, easily identifiable, naturally ordered and consistent.
- Ensure that a file can be independently identifiable if relocated or detached from its folder – ie *2016-12-04 BLKT1601 TAG Minutes* is more accessible than *2016-12-04 Minutes.*
- Avoid long file names and use of non-alphanumeric characters.
- File names should avoid spaces where possible. This reduces the file path length and mitigates the risk of corruption when saved to websites or certain file sharing programmes.
- Project related files should include the project number in the title. Do not insert a space between the building code and number. Ie CAGB1601 not CAGB 1601

3.1 Using numbers in file names:
To maintain numeric order, include the zero for numbers 0-9 (or 00 if the sequence is likely to be over 100)

Paper 01		Paper 1
Paper 02		**Paper 10**
Paper 03		**Paper 11**
Paper 04		Paper 2
Paper 05	rather than	Paper 3
Paper 06		Paper 4
Paper 07		Paper 5
Paper 08		Paper 6
Paper 09		Paper 7
Paper 10		Paper 8
		Paper 9

Dates and times should always follow the BS ISO 8601:2004 basic format of YYYY-MM-DD

Ie 21st January 2015 would be written as 2015-01-21

This ensures that the chronological order of the records is maintained when files are viewed in number order, aiding access to the latest dated record.

3.2 Naming correspondence records

File names of correspondence should include the following elements so that the record can be easily identified and retrieved:

- Name of correspondent: type surname first, followed by initials
- Subject description (keeping it brief)
- Date of correspondence (and time HH:MM for string emails)
- Type of correspondence (for email include "re", "fwd" etc)

Avoid long email subject titles when filing email correspondence, remove surplus characters (multiple uses of "re" or "fwd" and unnecessary spacing or punctuation)
When using email filing software such as Oasys Mail Manager, pay particular attention to the length of email title as this will be used in the program's automated file name.

3.3 Ordering the elements in a file name

The elements of a file name should be ordered according to the way in which the record will be retrieved or arranged.
ie: If records are easier located by date, then this element should appear first or if they are to be arranged by project number, that element should be first.

2016-11-18TAG-minutes		BLKT0601_PID
2016-10-14TAG-minutes		BLKT1103_PID
2016-09-17TAG-minutes	or	CAGB1602_PID
2016-08-03TAG-minutes		EENG1501_PID

Do not start a file name with "draft" or "final".

3.4 Applying version number and draft status

Version control procedures should be applied to documents which are frequently updated (policies etc). Inclusion of version number and date on the title page and within footers will provide an audit trail and reduce confusion over which document is the current version.

Decimal increments should be used to distinguish between major and minor changes. Use of "draft" or "final" can also be used at the **end** of a file name to distinguish between drafts and published versions.
Example:

- First draft may be v0.1_draft, then v0.2_draft .....
- Final version would then be v1.0
- A minor update denoted by a decimal increment: v1.1
- A major update would move to the next revision number: v2.0

3.5 File naming for website publication

When naming files for the College website, avoid use of the following:

- Uppercase characters

- Spaces
- Punctuation (other than -)

When updating documents uploaded to the website, the file must be named exactly the same as the existing version. This enables the new file to directly overwrite the original and maintain all hyperlinks to the document. Any change in version should be denoted in the footer of the document and can be included in the descriptive text on the website.

4 Digital Records' creation and storage

The potential lifespan, future use and access of the file should be considered when creating and naming a digital record. Digital files and the software used to view them can rapidly become obsolete. Where possible non-proprietary file formats should be used, allowing for files to be opened using a range of software applications instead of being tied to one licenced version. Open, non-proprietary formats are more likely to remain useable even if the software that created them is no longer available. PDF/A is an ISO standardised file format specialised for files requiring long term preservation.

File names should be concise and meaningful and all project files should include the project number. Refer to Section 3 for recommended file naming protocols.

Password protecting files is not recommended as these will no longer be accessible should the file creator leave the College. Contact the Records & Archives Officer for advice on storing confidential files.

The following sub-sections provide an overview of the digital file storage options currently provided by the College and reflect recommended Divisional use. Refer to ICT's web pages for full details.

4.1 X:drive
The division is provided with access to a Shared Drive (X:Estates \\icfs5g.cc.ic.ac.uk) serviced by the ICT Division for our divisional usage. Access is given by the PA and Team Administrator.

4.2 H:drive
All staff are allocated personal storage on the network.
This is intended for personal records and work in progress; access is restricted to the user and is backed up daily, making it more secure than saving to personal computers' C:drive. It should not be used to store final versions of College records as they will be lost if the staff member leaves the employment of the College.
Refer to ICT's pages for further details: http://www.imperial.ac.uk/admin-services/ict/self-service/connect-communicate/file-storage/home-directory-h-drive/

4.3 File sharing and external access.
The X:drive is restricted to users with Imperial College ID only; Project files which facilitate collaboration with external consultants can be set up on BOX cloud storage by the Records and Archives Officer (refer to section 4.3.2)

Caution should be made when using third party file sharing/cloud storage, as inappropriate use can lead to confidential / business sensitive information or personal data being stored outside of the College's control. Use of Dropbox or Google Drive is not recommended for sharing College information.

Sharepoint, whilst being a popular option in the College for collaboration, does not meet records management standards and can only be used by users with College ID, so is not recommended for storage of project records.

Personal One Drive storage is also not recommended for long-term storage of College records, as these will be lost if the staff member leaves the employment of the College.

The following options are recommended for collaborative use and meet with ICT security requirements.

4.3.1 File Exchange

The College's File Exchange service facilitates the transfer of files up to 2Gb in and out of the College.   Access and instructions for its use are available on ICT's web page: http://www.imperial.ac.uk/admin-services/ict/self-service/connect-communicate/sharing-and-collaboration/share-large-files-file-exchange/
Consideration should be made when transferring sensitive or confidential files, as the link can be forwarded by the recipient to others.

4.3.2 Box Data Storage

The college have approved use of Box as an encrypted cloud storage service and is now in use by Estates Operations for collaborative project filing on all major works' projects.

This policy document will be updated when procedures around its use have been finalised, however all users should be aware of College ICT security and data protection policies when using this facility to share information with external consultants.

Refer to ICT's webpages for further information on this service:
http://www.imperial.ac.uk/research-and-innovation/support-for-staff/scholarly-communication/research-data-management/imperial-policy/guidance/box/

Part 2 Divisional Records Management Policy

5 Scope and Definitions

Records are defined as recorded information, **in any form**, '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.'[4]

The scope of this policy relates to all operational and project records created, received or held in any format by the division, including:
- all project related records;
- all administrative records (for example Divisional, HR, safety, financial, accounting, training, photographs, awards);
- information which contributes to the culture and history of the College.

Records Management is defined as an administrative system to control the creation, storage use and disposition of records throughout their life cycle.[5] The key components of records management are:
- record creation
- record keeping
- record maintenance (including tracking of record movements)
- access and disclosure
- closure and transfer
- appraisal
- archiving
- preservation
- disposal.

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[4] BS ISO 15489-1:2016 definition of 'records', p2

[5] The term Records Life Cycle describes the life of a record from its creation/receipt through the period of its 'active' use, then into a period of 'inactive' retention (such as closed project files which may still be referred to occasionally) and finally either confidential disposal or archival preservation.

6 Aims of our Records Management System

The aims of our Records Management System are to ensure that:

- **records are available when needed** - to improve staff efficiency and productivity, reduce operating costs and enable better decision making.
- **records can be accessed** - records and the information within them can be located and displayed in a way consistent with its initial use, and that the current version is identified where multiple versions exist.
- **records can be interpreted** - the context of the record can be interpreted: who created or added to the record, during which business process, and how the record is related to other records;
- **records can be trusted** – the information reliably represents the business process in which it was used or created as a consequence of and its integrity and authenticity can be demonstrated;
- **records can be maintained through time** – the qualities of availability, accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed;
- **records are secure -** from unauthorised or inadvertent alteration or erasure, that access and disclosure are properly controlled and audit trails will track all use and changes.
- **records are retained and disposed of appropriately** - using consistent and documented retention and disposal procedures, which include provision for appraisal and the permanent preservation of records with archival value;
- **records can support business continuity** – measures are in place to ensure vital information required for operational purposes is protected in the event of a disaster
- **records are available to support legislative compliance** – to ensure reliable and accurate records can be retrieved to enable compliance with legal and regulatory requirements and to minimise litigation risks

Implementing a records management system includes ensuring that **all staff are trained:**
- To be aware of their responsibilities for record-keeping and record management.
- To understand the benefits to them in both their work and in protecting their rights and interests.

7 Roles and Responsibilities

College Secretary
The College Secretary has overall responsibility for records management within Imperial College London. As accountable officer they are responsible for the management of the organisation and for ensuring appropriate mechanisms are in place to support service delivery and continuity. The College has a particular responsibility for ensuring that legal responsibilities are met at a corporate level and for the adoption of internal and external governance requirements.

College Archives and Corporate Records Unit
The College Archives and Corporate Records Unit is responsible for ensuring that the College implements a records management policy and that local records management systems and processes are developed, coordinated and monitored.

Divisional Directors and upper management
The Director ensures that a local/divisional records management policy is approved, adopted and implemented across the division.

Divisional Records & Archives Officer
The Records & Archives Officer is responsible for the development and maintenance of records management practices throughout the division, overseeing and advising upon new filing/storage systems, drawing up guidance for good records management practice and promoting compliance with this policy in such a way as to ensure the easy, appropriate and timely retrieval of information.
They will liaise with ACRU, other relevant College division/departments and external organisations working with the division, to ensure the appropriate information is retained.
They manage the custody of inactive records and carry out audits to identify vital records within the division requiring long term and/or secure retention.

All Staff
All staff who create, receive and use records have records management responsibilities. In particular all staff must ensure that they keep appropriate records of their work and manage those records in keeping with this policy and with any guidance subsequently produced.

8 Legal and Professional Obligations

The College will take all necessary actions to comply with the legal and professional obligations set out in the College guidance, in particular:

- The Data Protection Act 2018;
- The Freedom of Information Act 2000;
- Environmental Information Regulations 2004;

And any new legislation affecting records management as it arises.

8.1 Personal Data

All staff and students who work with personal data are responsible for complying with the General Data Protection Act (GDPR). When saving, sharing or otherwise distributing records containing personal data, all staff should be aware of their legal responsibilities under GDPR.

All data that identifies staff, students or other individuals, produced in any format, should be stored securely and not disclosed unlawfully. Refer to the College's Legal Services webpages for further information: https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/gdpr/

9 Registration of Records

The Records & Archives Officer will establish and maintain mechanisms through which records are registered and maintained. The inventory of record collections will facilitate:

- the classification of records into series;
- the status of registered records within the system;
- the retention period relating to individual records.

10 Retention and Disposal Schedules

It is a fundamental requirement that specific divisional records are retained for a minimum period of time for legal and operational reasons. The length of time for retaining records will depend on the type of record and its importance to the College or Division's business functions[6].

It is equally important that records must not be retained for longer than they are legally required, to minimise risk of unnecessary disclosure and to enable more efficient records storage and retrieval.

The College has adopted the retention periods set out in this Records Management Policy. The retention schedule will be reviewed periodically. Refer to Appendix (iv) for the Estates Development & Projects' Records Retention Schedule

11 Records Management Audit

Records management practices will be regularly audited for compliance with College policy, legislative changes and changes within Division's work processes and requirements.

The audit will:

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[6] Divisional responsibilities are listed within the Retention Schedule – Appendix iii

- Identify areas of operation that are covered by the College policies and identify which procedures and/or guidance should apply to the policy;
- Follow a mechanism for adapting the policy to cover missing areas if these are critical to the creation and use of records, and use a subsidiary development plan if there are major changes to be made;
- Set and maintain standards by implementing new procedures, including obtaining feedback where the procedures do not match the desired levels of performance; and
- Highlight where non-conformance to the procedures is occurring and suggest a tightening of controls and adjustment to related procedures.

The results of audits will be reported to divisional senior management.

12 Training

All divisional staff will be made aware of their responsibilities for record keeping and record management through generic and specific training programmes and guidance.

Records Management and Freedom of Information training is available via the Staff Development pages, which should form a part of new staff induction and is strongly recommended for all staff. http://www.imperial.ac.uk/staff-development

Data Protection and Information Security Awareness training are also mandatory for all staff:
https://www.imperial.ac.uk/staff-development/learning-and-development-centre/courses/ipd/courses/data-protection/
http://www.imperial.ac.uk/admin-services/ict/self-service/be-secure/protect-college-personal-information/security-awareness-training/

13 Related standards and Guidance

Imperial College:
- Code of Practice 17 – Protecting Sensitive Data.
  https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/public/college-governance/charters-statutes-ordinances-regulations/policies-regulations-codes-of-practice/information-systems-security/Appendix-A.pdf
- Processing Personal Data. https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/processing-personal-data/
- ICT: Be Secure (ICT Security) http://www.imperial.ac.uk/admin-services/ict/self-service/be-secure/
- ACRU: Managing Your Records http://www.imperial.ac.uk/admin-services/acru/recordsmanagement/managingyourrecords/
- Data Protection Codes of Practice https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/our-policy/codes-of-practice/
- Legal Services Office: Freedom of Information https://www.imperial.ac.uk/admin-services/secretariat/information-governance/freedom-of-information/

- Estates Development & Projects' Record Document Guidelines
  http://www.imperial.ac.uk/estates-projects/resources/guides-policies/ :
    - RM07 Building Fabric manual production guidelines
    - RM08 O&M Manual production guidelines
    - RM09 Record Document process guidelines

External authorities:
- Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000 http://www.nationalarchives.gov.uk/documents/foi-section-46-code-of-practice.pdf
- British Standard ISO 15489-1:2016 Information and documentation – Records Management. Part 1: Concepts and Principles. Available from: http://www.iso.org/iso/catalogue_detail?csnumber=62542
- Information Commissioner's Office: Guide to Data Protection. https://ico.org.uk/for-organisations/guide-to-data-protection/

14 Review

This policy will be reviewed every two years (or sooner if new legislation, codes of practice, national standards or College policy are to be introduced).

Appendix i: Retention Schedule

This appendix consists of a reduced version consisting of records specific to Estates Development & Projects. The full College Retention Schedule can be located on ACRU's webpages.

Refer to next page