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| Work Instruction (WI) for: | |
| **Records management** | |
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| Author:  Reviewer: | **Paul Smallcombe, Records & Information Compliance Manager** **Catherine Redfern, Modern Records Manager, Barts and The London NHS Trust** |

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| Purpose and Objective: |
| To define the procedures for storing active and semi-active records and managing their disposal. |

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| References: |
| Information Classification Policy  QM Records Retention Policy and Schedule  QM Archive Collection Policy  Barts Health NHS Trust Collections Development Policy (Archives and Museums) |

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| WI Text |

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|  | Responsibility | Activity |
|  | Departmental Champions | **Storage Locations & Conditions**  Records which are not in active use but have not yet reached the end of their retention should be kept in storage for the remainder of their prescribed retention period. Semi-current records such as these should be kept in a secure location, i.e. with controlled access, which is free from conditions which may damage the records such as fire risk, damp or vermin, and which complies with any Health & Safety regulations. Records should not be stored in areas accessible to the public or in corridors. Records storage locations should be well-ordered and there should be an inventory maintained, for example in a spreadsheet, of all the records stored there to facilitate use and easy retrieval. |
|  | Departmental Champions | Electronic records should be stored on SharePoint (or networked shared drives which are backed up. Records must not be stored on local drives (e.g. C: drive or the Desktop) or on home computers. OneDrive should only be used for the storage of personal information, drafts or as a temporary storage location. Records must be stored in a format which remains readable for the duration of the retention period stated on the Records Retention Schedule. This means they should be checked every five years and/or when there is a software upgrade, whichever comes first, or as prescribed by IT Services. Consideration should be given to the possibility of deterioration of media used for storage of records; manufacturer’s recommendations should be followed for storage and handling. For long term storage, the use of paper and microfiche should be considered. |
|  | Departmental Champions | **Inventorying Records**  Records should be placed in boxes and the contents listed. Try to keep similar types of records and similar dates together. If records are mixed within the same box, then they must be listed at item/file level on the inventory (see step 6.). Do not overfill boxes. |
|  | Departmental Champions | Using the Inventory template spreadsheet, list the contents of each box or each folder as per steps 5. to 11. The template is available at [Inventory template.xlsx](https://qmulprod.sharepoint.com/:x:/s/IGChampions/EYxbXILhBAlNggfnU1Ue0oUBFDKIBSMM8z8wX_oJhvEdJw?e=rCUJJM) |
|  | Departmental Champions | **DEPARTMENT CODE –** enter the assigned two-letter code for your department e.g. WO. |
|  | Departmental Champions | **BOX/ITEM NUMBER** – give each box a unique identifier (write this on the outside of the box).  Never re-use a number once the contents have been destroyed, so it is recommended to start at 00001.  Inventorying at box level means that the whole of the box is given one description. Inventorying at file level means that each item within the box is numbered and described individually. If file level description is used then the rows on the inventory should be numbered accordingly e.g. the box no. is 07896: file 1 in the box should be numbered ‘07896/01’, file 2 ‘07896/02’ and so on. If listed at box level the number of the box will simply be ‘07896’. |
|  | Departmental Champions | **LOCATION** – enter the room and/or shelf number e.g. ‘Shelf A’. |
|  | Departmental Champions | **TITLE/DESCRIPTION** – this should be detailed enough to enable someone else, perhaps in several years’ time and with no knowledge of the records, to identify an item. Please avoid using abbreviations or project names alone as it is not guaranteed that others will know the meaning in years to come. Descriptions such as ‘miscellaneous’, ‘various’, ‘sundry’, ‘bumf’ must never be used. Equally ‘Mike’s stuff’ or ‘general files’ are not adequate. |
|  | Departmental Champions | **OWNER** – this should be a department/sub-team or ideally a specific person named by their job role and not by their name. |
|  | Departmental  Champions | **DATE FROM** and **DATE TO** – enter the earliest and latest date of records in a box or folder. If both dates are the same year, put it in both fields. |
|  | Departmental Champions | **REVIEW DATE** – retention cannot be indefinite, so each box must have a date when the records will have reached the end of their retention. Calculate this using the Records Retention Schedule (see from step 12. below). If the dates of records within a box vary, use the latest date to calculate the review date of the box. You might wish to make a note of the records series and retention period used in an optional column. |

* Example fields for a records inventory:

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| **Dept. Code** | **Box/Item No.** | **Location** | **Title/Description** | **Owner (Job role)** | **Date From** | **Date To** | **Review Date** |
| WO | 14 | Shelf A | Records documenting the award of bursaries, scholarships, fellowships, other funds | Director of Dept. | 2016 | 2017 | August 2023 |

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|  | Departmental Champions | **Calculating Review Dates**  The [Records Retention Schedule](https://www.qmul.ac.uk/governance-and-legal-services/governance/information-governance/records-management/records-retention-schedule/) lists the retention period for each type of record created or received. There are three fields:   1. the ‘Records Series’ is the group or collection of records that we use and keep, 2. the ‘Retention Period’ gives a length of time and 3. the ‘Trigger’ column sets out when the retention period should start.   If all records in a box have the same retention period, calculate the Review Date from the latest date in the box. If records have different retention periods, apply the longest retention policy to the whole box. This will ensure that all records are kept for the appropriate period of time. |
|  | Departmental Champions | Retention periods are calculated either from the end of an academic year, the end of a financial year or from a calendar year during which some ‘trigger’ event took place or the year a record was created. Payroll records are uniquely based on the UK tax year. The end of the retention period is called the review date and can only be January 20XX or August 20XX (apart from payroll which is May). Retention periods need to be worked out in whole years. |
|  | Departmental Champions | * Based on Academic year   The Academic year (Ay) runs from 1 August to 31 July  The retention period will be calculated from the academic year to which the records relate or in which the event took place.  *Example:* say the record relates to Ay 2017/18 and the retention period is 3 years from this Ay. This record should be reviewed in August 2021.   * Based on a Termination year (Ty) or year of creation (Cy)   This retention period may be used for records which span several years until they are ‘closed’, a last action is taken or have a trigger date when retention should begin, such as the termination of an employee (Ty) i.e. the calendar year the file was closed because the project was completed, a contract ended, a case was settled or the student/employee left Queen Mary. Alternatively retention may begin from the calendar year (or month) in which the record is created or received (Cy/Cm).  *Example:* say the record relates to a student whose relationship with Queen Mary ended in 2016 (Ty) and the retention period is 6 years from this Ty. This record should be reviewed in January 2023.  *Example:* another record relates to some annual tests carried out on some equipment during 2015 (Cy) and the retention period is 5 years from when the records were created. This record should be reviewed in January 2021.   * Based on Financial year   The Financial year (CFy) runs from 1 August to 31 July.  Records whose retention is based on the College’s financial year must have their review date calculated from the end of the relevant financial year i.e. 31 July, during which the transaction took place or to which the record relates. For example invoices dated July 2017 will be given a review date of August 2023 but invoices dated August 2017 would not be reviewed until August 2024. This ensures that the full number of complete financial years has elapsed.  *Example:* say the invoice relates to CFy 2022 (i.e. it is dated between 01/08/2021 and 31/07/2022) and the retention period is 6 financial years from the financial year in which the transaction took place. This record should be reviewed in August 2028. |
|  | Departmental Champions | **Retrieving Records from Storage and Access**  If records need to be retrieved from semi-current storage, then the request should be directed through the Information Governance Champion. This is to ensure that any loans are recorded on the inventory to show who has items, from which date and prevent them from going missing. When items are returned, the loan should be cancelled and the item replaced in storage by the Information Governance Champion. Make a note in the loan column of the dates the item was removed and returned to be kept as an audit trail. |
|  | Departmental Champions / Records & Information Compliance Manager | **Annual Review Process**  Once (or twice) a year, records which have reached the end of their retention should be reviewed to determine whether they need to be retained any longer for operational or business reasons or whether they can be destroyed. In addition, a few records series may be transferred to The Archives at this time. The disposition decision should be authorised by an appropriate individual(s) who has knowledge of the records, ideally the owner. This is one of the key mechanisms to ensure compliance with the Records Retention Policy.  The Records & Information Compliance Manager will be responsible for sending out a reminder for this process to be carried out. Technically, due to the different ways of calculating retention periods, reviews should be due in January and August each year. However, to reduce the burden of the task, reviews may only be carried out at one point in the year. |
|  |  | On the spreadsheet inventory filter the Review Date column to see only those records which have reached the end of their retention and cut and paste this into a new spreadsheet. Send the spreadsheet to the records owners and request that a review decision is made. The recipient should mark up the list by entering a ‘D’ for records to be destroyed and ‘R + year for future review’, e.g. R 2019, for records to be retained in a column called ‘Retain or destroy’.  Records should not normally be retained once their prescribed retention period has been completed. If the decision is taken that records are to be retained longer there MUST be a legitimate reason, such as anticipated or actual litigation, especially if the record contains personal data.  Destruction should only take place as part of the regular, systematic review and only where authorised.  At the end of the retention period, certain records do not need reviewing before destruction and disposal may not need to be recorded (e.g. ephemeral or transitory records - see [Appendix A](#AppendixA)). Some records, which have historical importance to QMUL (or Barts Health NHS Trust), may be transferred to The Archives for permanent preservation. These have been marked on the Retention Schedule with an **(A)**. If in doubt, please seek advice from the QMUL or Barts Health Archivists before destroying records. A useful steer of information of likely archival value is in the appendix of the [Archives Appraisal Policy](https://www.library.qmul.ac.uk/media/library/archives/Appraisal-Policy.pdf) and [Trust Collections Development Policy (Archives and Museums)](https://www.bartshealth.nhs.uk/download.cfm?doc=docm93jijm4n21489.pdf&ver=40705). |
|  | Records & Information Compliance Manager | Documentation should be kept noting what was destroyed on what date and who authorised this. This can be done by cutting the rows out of the inventory spreadsheet and making a new one with columns ‘Date Destroyed’ and ‘Authorised by’ and printing when completed. Where feasible, the Records & Information Compliance Manager will be responsible for retaining the master copy of the audit trail of all records destroyed. See also step 20. below. A certificate of destruction must be obtained for any records destroyed by an external party. |
|  | Departmental Champions / Records & Information Compliance Manager | The local records inventory should then be updated by deleting rows and changing the Review Dates as appropriate. |
|  | Departmental Champions / Records & Information Compliance Manager | **Disposition**  Records which have reached the end of their retention and have been reviewed are subject to disposition which can consist of one of two actions:   1. Destroy: appropriate destruction of those records which no longer have value (see step 21.), or 2. Transfer for permanent preservation: transferral to the College Archives of those records with continuing value (see step 22.).   Any record which is the subject of an ongoing information request (or legal case) should not be destroyed, even if due for destruction according to the retention schedule. |
|  | Departmental Champions | **Destruction**  All records must be disposed of appropriately and this will depend on their information classification and medium in which it is held. |
|  | Departmental Champions / The Archivist(s) | **Transfer to The Archives**  Those records which have been selected for permanent preservation will be transferred to The Archives based in the Main Library at Mile End as per the Archives Collection Policy, or, in the case of the Faculty of Medicine and Dentistry, to the Barts Health NHS Trust Archives based at St. Bartholomew’s Hospital. Once review has taken place arrangements shall be made with the Archivist to receive records as necessary. |

**Appendix A – Records which may be routinely destroyed**

Ephemeral material should be disposed of on a routine basis. As a rule, the following types of records have no significant operational, informational or evidential value.  They can therefore be destroyed as soon as they have served their primary purpose.

###### Examples

* Announcements and notices of meetings and other events, and notifications of acceptance or apologies
* Requests for stock information such as maps and travel directions, brochures etc.
* Requests for, and confirmations of, reservations for internal services (e.g. meeting rooms, car parking spaces, pool cars) where no internal charges are made
* Requests for, and confirmations of, reservations with third parties (e.g. travel, hotel accommodation, restaurants) when invoices have been received
* Transmission documents: letters, fax cover sheets, email messages, routing slips, compliments slips and similar items which accompany documents but do not add any value to them
* Message slips
* Superseded address lists, distribution lists etc.
* Duplicate documents such as:
  + ‘CC’ and ‘FYI’ copies
  + Unaltered drafts
  + ‘Snapshot’ printouts or extracts from databases
  + ‘Day Files’ (chronological copies of correspondence)
* Personal diaries, address books etc.
* Working papers, where the results have been written into an official document and which are not required to support it
* Non-business emails, e.g. lunch arrangements
* Stocks of in-house publications which are obsolete, superseded or otherwise useless e.g. magazines, marketing materials, prospectuses, catalogues, manuals, directories, forms, and other material produced for wide distribution
* Published or reference materials received from other parts of the institution or from vendors or other external organisations which require no action and are not needed for ‘record’ purposes, e.g. trade magazines, vendor catalogues, flyers, newsletters
* Copies of transactional documents like invoices and goods received notes

**Appendix B – quick reference tables for calculating review dates**

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| **Retention Period in academic or financial years** | **6 years** | **3 years** | **10 years** | **20 years** |
| **Ay or CFy** | **Review Date** | **Review Date** | **Review Date** | **Review Date** |
| 2006/07 (i.e. 01/08/2006 – 31/07/2007) | August 2013 | August 2010 | August 2017 | August 2027 |
| 2007/08 (i.e. 01/08/2007 – 31/07/2008) | August 2014 | August 2011 | August 2018 | August 2028 |
| 2008/09 (i.e. 01/08/2008 – 31/07/2009) | August 2015 | August 2012 | August 2019 | August 2029 |
| 2009/10 (i.e. 01/08/2009 – 31/07/2010) | August 2016 | August 2013 | August 2020 | August 2030 |
| 2010/11 (i.e. 01/08/2010 – 31/07/2011) | August 2017 | August 2014 | August 2021 | August 2031 |
| 2011/12 (i.e. 01/08/2011 – 31/07/2012) | August 2018 | August 2015 | August 2022 | August 2032 |
| 2012/13 (i.e. 01/08/2012 – 31/07/2013) | August 2019 | August 2016 | August 2023 | August 2033 |
| 2013/14 (i.e. 01/08/2013 – 31/07/2014) | August 2020 | August 2017 | August 2024 | August 2034 |
| 2014/15 (i.e. 01/08/2014 – 31/07/2015) | August 2021 | August 2018 | August 2025 | August 2035 |
| 2015/16 (i.e. 01/08/2015 – 31/07/2016) | August 2022 | August 2019 | August 2026 | August 2036 |
| 2016/17 (i.e. 01/08/2016 – 31/07/2017) | August 2023 | August 2020 | August 2027 | August 2037 |
| 2017/18 (i.e. 01/08/2017 – 31/07/2018) | August 2024 | August 2021 | August 2028 | August 2038 |
| 2018/19 (i.e. 01/08/2018 – 31/07/2019) | August 2025 | August 2022 | August 2029 | August 2039 |
| 2019/20 (i.e. 01/08/2019 – 31/07/2020) | August 2026 | August 2023 | August 2030 | August 2040 |

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| **Retention Period in calendar years** | **6 years** | **3 years** | **10 years** | **20 years** |
| **Calendar year** | **Review Date** | **Review Date** | **Review Date** | **Review Date** |
| 2015 | 2022 | 2019 | 2026 | 2036 |
| 2016 | 2023 | 2020 | 2027 | 2037 |
| 2017 | 2024 | 2021 | 2028 | 2038 |
| 2018 | 2025 | 2022 | 2029 | 2039 |
| 2019 | 2026 | 2023 | 2030 | 2040 |
| 2020 | 2027 | 2024 | 2031 | 2041 |
| 2021 | 2028 | 2025 | 2032 | 2042 |
| 2022 | 2029 | 2026 | 2033 | 2043 |
| 2023 | 2030 | 2027 | 2034 | 2044 |
| 2024 | 2031 | 2028 | 2035 | 2045 |
| 2025 | 2032 | 2029 | 2036 | 2046 |
| 2026 | 2033 | 2030 | 2037 | 2047 |
| 2027 | 2034 | 2031 | 2038 | 2048 |
| 2028 | 2035 | 2032 | 2039 | 2049 |