THE GLASGOW SCHOOL OF ART

Records Management Policy

POLICY DETAILS:

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Responsible Executive Group area	Research & Enterprise
Related policies and documents	GSA Data Protection Policy; GSA Data Classification Policy; GSA Policy for Staff Electronic File Backup; GSA Information Technology Security Policy; GSA Staff Acceptable IT Use Policy; GSA Freedom of Information Model Publication Scheme; GSA Archival Selection Guidelines; GSA Archives and Collections: Collections Development Policy; GSA Library Collections Strategy
Benchmarking	n/a

Contents

1. Introduction, scope and audience of the policy

This policy outlines the approach of the Glasgow School of Art in relation to records and information management, and is for the attention of all staff working for the GSA.

Records are key resources containing information essential to the continued operation of the GSA. Records provide evidence of business transactions and activities, and are vital to forming the GSA's corporate memory, and in many cases supporting the creation of new knowledge.

Within the context of this policy, **records** should be interpreted as items in all technical or physical formats or media, created or received by the GSA in the conduct of its business activities, such as:

- documents (including written and typed documents and annotated copies)
- computer files (including word processor files, databases, spreadsheets and presentations)
- paper based files
- electronic mail messages
- diary records
- fax messages
- reports
- intranet and internet web pages. [1]

The underlying principle of **records management** is to ensure that a record is managed through its life cycle, from creation or receipt, through maintenance and use, to disposal. Good records management relies on the following:

- the creation of appropriate records
- the capture of records (received or created) in record keeping systems
- the appropriate maintenance and up-keep of these records
- the regular review of information
- the controlled retention of information
- the controlled destruction of information.

With good records management, the GSA will benefit from records being easily and efficiently located, accessed and retrieved; information and personal data being better protected and securely stored; and records being disposed of safely and at the right time. [2]

The Glasgow School of Art recognises that its records and information are key assets that need to be managed to maximise benefits both to individual members of staff, and to the GSA.

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[1] adapted from the Information Commissioner's Office Records Management Policy, p.3:
https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/element3-IC.pdf
[2] adapted from the Information Commissioner's Office Records Management Policy, p.2
https://www.nrscotland.gov.uk/files/record-keeping/public-records-act/element3-IC.pdf

2. Principles

2.1 General

The GSA aims to manage its paper and electronic records in such a way as to maximise its effectiveness and to comply with legislation, with records (and the information they contain) being retrieved in an accurate, timely and consistent manner to aid decision making and the generation of new knowledge, while underpinning corporate governance and accountability.

The Glasgow School of Art is committed to meeting the requirements of the Section 61 Code of Practice: Records Management that accompanies the Freedom of Information [Scotland] Act 2002 ("FOISA"), as well as the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 (GDPR). In particular, the six principles of data protection, as laid down by the GDPR, seek to ensure that data must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. The six principles are:
- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Security and confidentiality

Further information is available in the GSA Data Protection Policy. [3]

Good records management practice supports the appropriate handling and storage of confidential information and personal data, and compliance with data protection legislation. The GSA will manage its records effectively and efficiently, in accordance with the GSA's records retention schedules, to support all of its business activities in line with GSA strategy and to meet the above statutory and regulatory requirements.

All records that GSA staff create, receive or maintain during the course of their employment belong to the GSA, and must be managed accordingly. Staff leaving the GSA or changing positions within it are required to leave all records for their successors.

2.2 Vital records

Vital records are those which, in the event of a disaster, are critical to maintaining GSA's business continuity. This includes documents relating to the legal and financial status of the GSA, and records which preserve the rights of the institution, such as contracts, insurance details, Board minutes, Memoranda and Articles of Association, and funding agreements.

All records that are identified as being vital to the running of the GSA should be stored in fire-proof safes and multiple copies should be kept in different locations, preferably different buildings. If vital records are in an electronic format, a copy should be backed up and held within off-site storage.

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[3] The GSA Data Protection Policy can be found at this link:
http://www.gsa.ac.uk/about-gsa/key-information/general-data-protection-regulation/

2.3 Communication and dissemination of the policy

The Institutional Repository and Records Manager (IRRM), Executive Group members, Heads of Department (academic and professional support) and Programme Leaders are charged with communicating this policy to staff across the GSA and within their departments respectively, along with the importance of good records management in general.

2.4 Training, information and guidance

The IRRM maintains a set of GSA web pages containing information and guidance materials on good records management, and staff can contact the IRRM for records management support and advice.

Further information is available at the following web page:
http://www.gsa.ac.uk/about-gsa/key-information/records-management/.

The IRRM will devise and provide appropriate training in records management, targeted at specific practices, responsibilities and needs, for existing and new GSA staff.

2.5 Storage

All records will be stored in an appropriate manner, i.e. a secure filing cabinet, drawer or cupboard, or on a GSA network, and will be properly indexed to enable the easy retrieval of records. GSA records retention schedules, established in liaison with individual departments, will inform the arrangement of records to reflect the business needs of the GSA; and guidance on the effective naming of files and version control will be provided.

2.6 Historical records (Archives)

The GSA aims to preserve those records designated as having permanent legal, administrative or research value at the earliest possible stage in the records life cycle. Given the rapid pace of technological change in the digital age and the vulnerability of digitally held information, archival status records held solely in electronic formats need to be designated as such soon after creation or receipt.

The GSA's Archival Selection Guidelines have been developed in consultation with GSA's Archivist, and are available at the following web page: http://www.gsaarchives.net/policies/ . The guidelines set out how records are identified for transfer to the GSA's Archives, based on GSA's activities and types of records.

2.7 Retention and disposal schedules

Equally as important as maintaining and preserving records properly is disposing of them appropriately when they are no longer needed. This is especially important in relation to data protection. Records retention and disposal schedules will govern both how long records should be retained, and how and when they should be disposed of, in accordance with best practice and in liaison with individual departments, taking account of equality consideration and to reflect the business needs of the GSA. The GSA's records retention schedules will be published within GSA's model publication scheme under the Freedom of Information (Scotland) Act 2002.

3. Roles and responsibilities

Records management bestows a number of obligations on individual members of staff, the Institutional Repository and Records Manager (IRRM), and the GSA itself.

3.1   The Glasgow School of Art

The Glasgow School of Art is committed to establishing and modelling good records management, which maximises benefits both to individual members of staff, and to the GSA. Overall strategic responsibility for records management is held at a senior level, by the GSA's Deputy Director (Academic).

The GSA's Executive Group is responsible for:
- promoting and ensuring compliance with this policy
- advising on strategic developments that are likely to impact on records management
- releasing appropriate resourcing
- supporting the management of change.

3.2   The Institutional Repository and Records Manager

The Institutional Repository and Records Manager (IRRM) has a co-ordinating and enabling role, advising on policy, staff responsibilities and best practice. The IRRM is responsible for:
- the design, implementation and maintenance of records management systems
- day to day responsibility for records management, reporting to the Head of Research & Enterprise, and liaising with GSA colleagues as appropriate
- providing the GSA with professional authoritative advice and information on records management, disseminating best practice and developments, maintaining a set of GSA web pages, and providing support materials (including procedures, information and guidance materials on good records management)
- organising and providing staff training on records management
- evaluation of records management functions.

3.3   Executive Group members, Heads of Department (academic and professional support) and Programme Leaders

Executive Group members, Heads of Department (academic and professional support) and Programme Leaders are responsible for ensuring that records within their areas of responsibility are managed in accordance with GSA policy and procedures, and that staff within their areas clearly understand their records keeping responsibilities, and receive appropriate training.

3.4   All GSA staff

The GSA expects all staff to ensure that the records for which they are responsible are accurate, indexed appropriately, and are created, maintained and disposed of in compliance with GSA policy and procedures.

4. Further information and support

This policy should be read in conjunction with the related GSA policies and documents listed below, especially the **GSA Data Protection Policy** and the **GSA Data Classification Policy**. The latter sets out the following categories for classifying data: public; internal; restricted; and highly sensitive.

GSA policy	Link to web page
GSA Data Protection Policy	http://www.gsa.ac.uk/about-gsa/key-information/general-data-protection-regulation/
GSA Data Classification Policy	http://www.gsa.ac.uk/about-gsa/key-information/policies/institutional-policies/
GSA Policy for Staff Electronic File Backup	http://www.gsa.ac.uk/about-gsa/key-information/policies/it-policies/
GSA Information Technology Security Policy	http://www.gsa.ac.uk/about-gsa/key-information/policies/it-policies/
GSA Staff Acceptable IT Use Policy	http://www.gsa.ac.uk/about-gsa/key-information/policies/it-policies/
GSA Freedom of Information Model Publication Scheme	http://www.gsa.ac.uk/about-gsa/contact-us/foi-requests/
GSA Archival Selection Guidelines	http://www.gsaarchives.net/policies/
GSA Archives and Collections Collections Development Policy	http://www.gsaarchives.net/policies/
GSA Library Collections Strategy	https://lib.gsa.ac.uk/library-policies/

In addition, the following GSA staff can provide further information and support:

- the **Institutional Repository and Records Manager** can advise on policy and practice relating to information handling and records management. Further information and contact details can be found on this web page: http://www.gsa.ac.uk/about-gsa/key-information/records-management/
- the **Archives and Collections Manager** can advise on what types of records are suitable for permanent preservation in the School's Archives and on how to transfer this material. In the first instance please contact archives@gsa.ac.uk
- the **IT Helpdesk** can be contacted with any queries relating to the appropriate security and technical controls required to store and protect information and records: gsaitservicedesk@gsa.ac.uk
- the **Data Protection Officer** can provide information, guidance and advice on all aspects of the GDPR, and can be contacted at dataprotection@gsa.ac.uk
- the **FoI Co-ordinator** can advise on how to determine whether information and records are disclosable, and should always be contacted when a FoI request is received: foicoor@gsa.ac.uk

5. Status of this policy

This policy for records management at the GSA has been reviewed and updated by the Institutional Repository and Records Manager, including an assessment for equality impact. It was originally considered and approved by the GSA Research and Knowledge Exchange Committee in October 2016. The policy will be subject to ongoing review.

Nicola Siminson, Institutional Repository and Records Manager; policy last updated July 2018