

Managing Digital Information and Records at the University of Warwick

Introduction

Page | 1

- The guides on the following pages help identify what records actually are, how to manage them when they are created in an electronic format (born digital) and the retention and storage arrangements for them and a limited range of other types of information that are typically held in University Information systems.
- When data and information are captured in digital form (e.g. in an MS Word document, MS Excel spreadsheet, Email [not an exhaustive list]) they need management throughout their lifecycles to ensure that best use is made of them as [information assets](#) and to ensure that they meet the compliance requirements of the purpose for which they were created.
- An example of a compliance requirement is the General Data Protection Regulation's (GDPR's) [Storage Limitation principle](#) which stipulates that personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The GDPR lists the limited instances when, and the conditions under which, personal data can be retained for longer in relation to archival purposes in the public interest, scientific or historical research purposes or statistical purposes.
- Effective management of information helps ensure that a specific item: can be located when needed; is securely stored; is reliable as evidence of a decision or business transaction; and can be destroyed at the appropriate time. This guide supports the management of information by offering guidance that aims to help you make decisions about:
 - Where to store, and how long to keep, certain types of information that you work with at the University.
 - Whether certain types of information are classed as records of the University's activities and require management in line the University's [Records Management Policy and Records Retention Schedule](#).
- This guide forms part of the University's [Information Security Framework](#) and supports the management of information in line with its: [Information Handling Policy \(IS04\)](#) and [Information Classification Policy \(IG05\)](#)
- This guidance has a broad scope in terms of the general advice it provides on the lifecycle management of information and records. It is though also important to acknowledge its limitations. As an evolving document it currently covers a limited: range of scenarios; types/formats of digital information which are held in a limited number of information systems.
- This guidance does not seek to provide advice on specialist information management areas at the University such as Research Data Management. For advice on the management of research data please visit the University's [Research Data Management Webpage](#) or set out your enquiry in an email to: researchdata@warwick.ac.uk

Information Access Rights Considerations

When assessing the value of information contained within documents, emails or notes, consideration should also be given to:

Page | 2

- Data subjects rights under the Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) 2016; and
- The right of access to information under the [Freedom of Information Act \(FOIA\) 2000 and Environmental Information Regulations 2004](#).

Data Protection:

- [Data subject rights](#) include: right of access, rectification and erasure in relation to their personal data (this list of rights is not exhaustive). When deciding whether different versions of documents, emails or notes (for example) should be retained, consideration should be given to whether they contain personal data and to what extent they continue to serve the purpose for which they were first created.
- If the purpose for which the information was first created has been superseded, or its purpose has been served, consideration should be given as to the potential implications of retaining the information in relation to data subject rights and the University's wider data protection obligations.

Freedom of Information:

- The University, as a public authority, is also subject to the Freedom of Information Act 2000 (FOIA) which covers all recorded information held. This is not limited to official documents but also covers: drafts, emails, notes, etc. Just because the final version of a document is published or disclosed under a FOIA request, does not mean that a draft version of that document falls outside the scope of the legislation.
- As such, consideration should be given as to whether documents, emails or notes (etc.) which discuss University business continue to serve any ongoing and legitimate business purpose or whether retention simply poses the risk of something no longer helpful or accurate being disclosable under a FOIA request.

How to identify a record and where to store it

- The University's Records Management Policy uses the Standard ISO BS 15489:1-2016 to define a record as follows:
 - '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'.

- o ‘...should possess the characteristics of authenticity, reliability, integrity and usability to be considered authoritative evidence of business events or transactions and to fully meet the requirements of the business’.

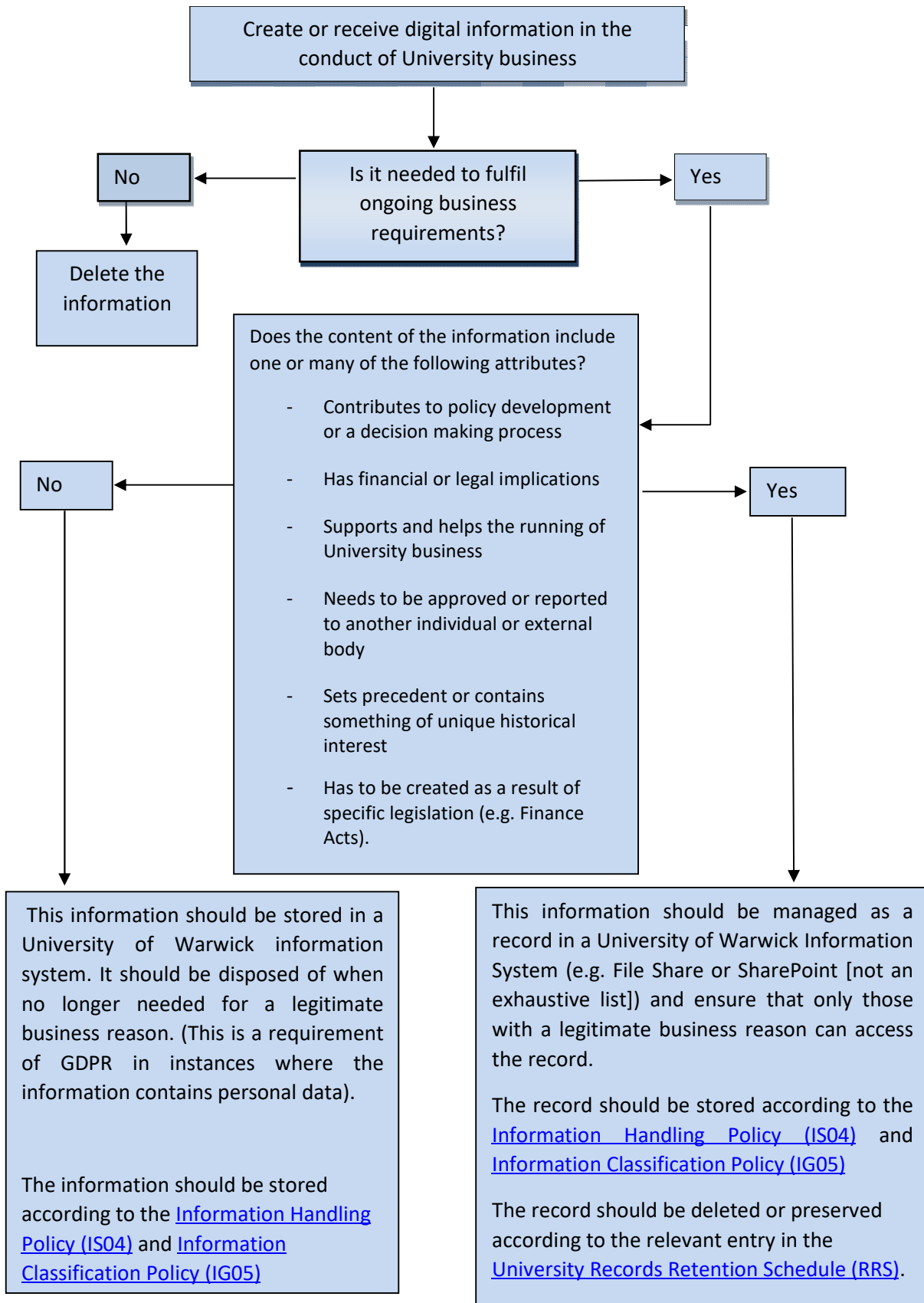
Page | 3 **How to manage records**

The aim of the following table and flow chat is to help you make decisions about whether information is a record and where to store it during its lifecycle.

How to identify a record	Is it a record?	Where should the record be stored?
Does the content of the item contribute to policy or decision making process?	Yes	In a University of Warwick Information System (e.g. File Share or SharePoint and ensure that only those with a legitimate business reason can access the record). The record should be stored according to the Information Handling Policy (IS04) and Information Classification Policy (IG05) The Record should be deleted or preserved according to the relevant entry in the University Records Retention Schedule (RRS) .
Does the content of the item give evidence of an action taken or decision made?	Yes	
Does the content of the item give evidence of a change to organisational policy or procedure?	Yes	
Does the content have financial or legal implications (e.g. a contract, a grievance case)?	Yes	
Is the content needed to support and help the running of University business (e.g. team budgets, purchase orders of IT systems, business continuity management)?	Yes	
Does the content need to be approved by, or reported to, another individual or internal or external body?	Yes	
Does it set a precedent or contain something unique of historical interest (e.g. an intranet snapshot, audio clip or video file)?	Yes	
Does it have to be created as a result of specific legislation (e.g. Finance Acts)?	Yes	

How to manage and identify records - Flow Chart

Information should be stored in line with the [Information Handling Policy \(IS04\)](#) and [Information Classification Policy \(IG05\)](#)



Managing different types of information

The table is a guide to managing other types of information held in University Information Systems. In each case you will need to assess for yourself the value of the information before deciding whether to retain (for a period of time before reviewing again) or deleting it.

Page | 5

Information Type	Where should I store this information?	When should it be deleted (destroyed)?
<p>Early drafts (e.g. draft documents) that are:</p> <ul style="list-style-type: none"> ○ not shared with colleagues and are superseded by later versions. ○ not further developed. 	<p>In some cases this might be in the 'Documents' area on your work computer. Discuss the approach taken by the team with your Line Manager.</p> <p>The draft should be stored according to the Information Handling Policy (IS04) and Information Classification Policy (IG05)</p>	<p>This is not a final version and should be deleted once superseded or a decision made that it will not be developed.</p>
<p>Drafts circulated for comment or that document a change in approach:</p> <ul style="list-style-type: none"> ○ Consider the University's guidance on Naming Conventions when saving/storing the information. ○ The creator should ensure a copy of the information is stored on a University Information system (e.g. File Share or SharePoint). 	<p>If the comments have continuing value to the University in terms of demonstrating how key areas of work have developed or an important decision was reached then this should be moved to a shared University Information system and access provided to only those who are allowed to see the comments for legitimate business reasons.</p> <p>In some circumstances draft documents could be as, or more, sensitive than the final version (e.g. it could contain commercially sensitive data, or the names of contributors [which might not be released]). An example of this is when documents contain draft policies that will later be changed or removed but could cause harm to the institution if they were released before being finalised.</p>	<p>Destroy when superseded and/or when the comments no longer add value to understanding how the final version was arrived at.</p> <p>If the comments continue to have value after a final version is produced then manage the lifecycle of the draft in line with the relevant entry set out in the University Records Retention Schedule.</p>

Information Type	Where should I store this information?	When should it be deleted (destroyed)?
<p>Final Versions</p> <ul style="list-style-type: none"> Meets the ‘yes’ criteria of ‘how to identify a record’ on page 3. 	<p>In a University of Warwick Information System (e.g. File Share or SharePoint) and ensure that only those with a legitimate business reason can access the record.</p> <p>The record should be stored according to the Information Handling Policy (IS04) and Information Classification Policy (IG05)</p>	<p>The Record should be securely destroyed or preserved according to the relevant entry in the University Records Retention Schedule (RRS).</p>

Email

- Email is a method of exchanging messages between people. It has been likened to a regular letter: containing an address, routing information and content. Email messages can be on any subject and as such it is not a type of record with a single retention period.
- As email is a prominent tool in which information is exchanged at the University (and the wider world) this guide devotes a section on how the lifecycle of emails can be managed.
- In each case when using the guidance and flow chart you will need to assess for yourself the value of the information an email contains before deciding whether to retain (for a period of time before reviewing again) or deleting it.

Information Type	Where should I store this information?	When should it be deleted (destroyed)?
<p>Personal emails</p> <p>Emails containing information not related to wider University work and that do not have enduring value to the organisation. The emails do not contain information needed:</p> <ul style="list-style-type: none"> to meet a legislative requirement; to meet a continuing business requirement for historical research and of long term interest to wider society. 	<p>Inbox</p>	<p>Delete as soon as possible when no longer required.</p>

Information Type	Where should I store this information?	When should it be deleted (destroyed)?
<p>Routine University business emails. The emails do not contain information needed:</p> <ul style="list-style-type: none"> to meet a legislative requirement; to meet a continuing business need; for historical research and of long term interest to wider society. 	<p>Inbox (or sub folders) or Team Resource Account (with access restricted to only those with a legitimate need to access the Resource Account).</p>	<p>Delete as soon as possible when no longer required.</p>
<p>Emails arranging meetings</p>	<p>Inbox</p>	<p>In most instances delete as soon as possible after the meeting has taken place.</p> <p>An exception would be where there is a legitimate reason to keep details of the meeting arrangements as part of a record (evidence) of the event.</p> <p>The Record should be securely destroyed or preserved according to the relevant entry in the University Records Retention Schedule (RRS).</p>
<p>Emails reflecting key decisions and University business activities.</p> <ul style="list-style-type: none"> Meets the ‘yes’ criteria of ‘how to identify a record’ on page 3. 	<p>In a University of Warwick Information System (e.g. File Share or SharePoint) and ensure that only those with a legitimate business reason can access the record.</p> <p>The email should be stored according to the Information Handling Policy (IS04) and Information Classification Policy (IG05)</p>	<p>The email should be securely destroyed or preserved according to the relevant entry in the University Records Retention Schedule (RRS).</p>

Managing emails - Flow Chart

Emails should be stored in line with the [Information Handling Policy \(IS04\)](#) and [Information Classification Policy \(IG05\)](#)

