

BIRMINGHAM CITY UNIVERSITY

Records Appraisal & Disposal Guidance

Document Control	
Version	1
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Effective date	July 2015
Review date	July 2016

1. Purpose

To define the responsibilities and approach associated with the appraisal and disposal of records at Birmingham City University (BCU).

2. Scope

This guidance defines the process for the appraisal, storage and disposal of records, regardless of format.

3. Definitions

Records are information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business. Records are defined by their content and value for the organisation and not by their format.

Examples of records include: board and committee agendas, papers and minutes; policies, contracts, staff files, student files, reports including project reports, financial information, databases, research data, email messages that document a business decision or transaction, web pages, maps, plans and photographs.

Record copies exist where duplicate copies of records exist in multiple business units for administrative reasons. The record copy is held by the business unit ultimately responsible for the management of the record. The record copy is the only copy which should be managed as a record, other copies should be managed as documents.

Documents are information which is used on an operational or informational basis but that does not have on-going value to BCU.

Examples of documents include: blank forms, drafts, meeting notes, team holiday schedules, email messages which do not evidence a business decision or transaction.

Retention is the process of determining how long a particular class of records should be kept to meet compliance or business needs. Minimum retention periods for common record types are specified in the BCU Records Retention Schedules.

Appraisal is the process of determining what disposal action should be taken once the minimum retention period has been met.

Disposal is the action taken once a record has been appraised. Disposal actions are:

- **Retain** - where records remain valuable for compliance or business reasons in excess of the minimum retention period they should be retained for a further specified period.
- **Transfer** to the University Archive - where records have on-going / historical value and are no longer required for current business they should be transferred to the University Archive for permanent preservation.
- **Destroy** - where records have no further value to the University they should be destroyed by methods appropriate to the format and sensitivity of the information.

4. Responsibilities

Information Management are responsible for providing guidance in relation to good records management practice. This includes the provision of advice in relation to: appropriate storage, retention requirements, disposal actions and secure destruction methods for physical records.

Corporate ICT are responsible for providing guidance in relation to the secure destruction of electronic records and the disposal of redundant computer equipment.

Procurement are responsible for the procurement of the waste disposal contracts and vetting potential suppliers to ensure they meet BCU security requirements.

Waste disposal contractors are responsible for the secure storage and transmission of records in their possession prior to destruction.

All staff are responsible for:

- Storing records securely prior to collection by the University's shredding contractor.
- Making appropriate use of the confidential waste facility provided by the University's shredding contractor.
- Keeping evidence of the authorisation and destruction of records.

5. Appraisal

Records should be appraised to determine an appropriate disposal action. Disposal actions may be either: retain, transfer, or destroy.

The University Records Retention Schedules identify minimum periods for which records must be retained. If records are required for current business beyond this minimum period they should be assigned a review date at which their on-going value will be reassessed by repeating the appraisal process. Assigning a review date is essential where records contain personal data¹ as the Data Protection Act places a responsibility on BCU not to keep personal information for longer than is necessary.

¹ As defined by the Data Protection Act

Records that are no longer required for current business but have not yet been retained for the minimum retention period may be transferred to alternative storage² until the minimum retention period is met.

Documents should be destroyed once no longer required for current business.

Where duplicate records are held, the Department/Faculty with management responsibility for the record should retain the record copy for at least the minimum retention period in line with this guidance. Additional copies should be destroyed once no longer required for current business.

Records and documents should not be destroyed if they are currently the subject of: litigation; audit; investigation; or a FOI request, complaint or appeal³.

Destruction of records should be approved by the Dean/Director; authority may be delegated. A record of the authorisation and destruction should be kept, see Appendix A for a sample form.

Refer to Appendix B for a flow chart demonstrating the appraisal process.

6. Storage & Transfer

Records and documents should be held in appropriately secure storage relative to the sensitivity of their content. Any movement or transfer should be similarly secure.

Sensitivity may be categorised by considering if the information is:

- **Public** – i.e. the information is already in the public domain. This will include published information such as: web pages, leaflets and hand-outs, presentations, course guides, magazines, published reports.
- **Disclosable** – i.e. you would release the information if requested in a FOI request. This will include: publically available information relating to individuals; published accounting records; information which would not damage BCU financially, commercially or reputationally if disclosed.
- **Non-disclosable** – i.e. you would withhold the information if requested in a FOI request. This will include:
 - information relating to identifiable individuals (e.g. student records, staff records);
 - financially sensitive information (e.g. unpublished accounting records);
 - information supplied to BCU in confidence (e.g. completed questionnaires);
 - commercially sensitive information (e.g. contracts, tenders, purchasing records, insurance records, unpublished committee minutes);
 - records which if disclosed may breach intellectual property rights (e.g. unpublished research material, drafts and manuscripts).

² Such as cheaper but less accessible offsite storage.

³ To destroy these records may be an offence under Section 77 of the FOIA.

Where checking the sensitivity of records and documents is impractical their content should be assumed to be non-disclosable.

Non-disclosable records and documents should be held securely at all times to limit the risk of unauthorised access. Secure storage may include locked cabinets, bins and rooms; or secure network locations and encrypted external storage devices.

Any movement or transfer of non-disclosable records and documents should be secure, even if they are awaiting destruction. Non-disclosable records and documents should not be left unattended in insecure locations such as loading bays or corridors, even if they are in tied shredding sacks.

7. Disposal

Records should be transferred to the University Archive if the Records Retention Schedule defines their retention period as 'permanent' and they are no longer referred to for current business.

Records and documents due for destruction should be destroyed in a manner appropriate to the sensitivity of their content. The appropriate destruction method should be used as outlined in the table below.

Sensitivity	Physical	Electronic
Public / Disclosable	Recycle Locked recycling bins provide additional security against unauthorised access.	Information on the BCU network (including BCU email accounts) should be deleted and then removed from the recycle bin ⁴ . Optical media (e.g. CDs) should be shredded. Where appropriate, storage devices (such as USB/Flash disks, Hard Disk Drives, Solid State Drives) may be reused. If the device has been rendered inoperable then it must be destroyed using disintegration.

⁴ Information which remains in the recycle bin is still considered to be held under the FOIA and may need to be disclosed in response to a request.

Non-disclosable	Securely shred, pulp or incinerate using University approved supplier for confidential waste services.	<p>Information on the BCU network (including BCU email accounts) should be deleted and then removed from the recycle bin.</p> <p>Optical media (e.g. CDs) should be shredded.</p> <p>Where appropriate, storage devices (such as USB/Flash disks, Hard Disk Drives, Solid State Drives) may be reused and redeployed within an environment of the same security level (e.g. reusing a hard disk from a student PC in another student PC) following a software erase.</p> <p>If the device has been rendered inoperable then it must be destroyed using disintegration.</p>
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When destroying records, a record of authorisation and destruction should be maintained. The form in Appendix A may be used for this purpose. Where destruction is completed by a waste disposal contractor a destruction certificate will also need to be obtained from the contractor and retained.

All records of destruction should be retained by the Department/Faculty for the period defined in the Records Retention Schedule.

8. Related policies and documents

BCU documents

- [BCU Records Retention Schedules](#)
- [Information Security Policy](#)

Relevant Legislation and Standards

- [Data Protection Act 2018](#)
- [General Data Protection Regulation \(GDPR\)](#)

- [Environmental Information Regulations 2004](#)
- [Freedom of Information Act 2000](#)
- [Lord Chancellor's Code of Practice on the management of records, issued under Section 46 of the FOIA](#)

9. Appendices

Appendix A – Record of destruction

Department / Faculty:	
Owner (<i>name and position</i>):	
Date:	

Description of records for destruction (<i>e.g. Exceptional Circumstances Claims 2008 Surnames H-S</i>)	Authority for destruction (<i>e.g. BCU retention schedule</i>)	Destruction approved(*)

The above records <u>are not</u> the subject of: litigation; audit; investigation; FOI request, complaint or appeal. (<i>please tick</i>)		
Destruction approved(*) by: (<i>Dean/Director/Authorised person</i>)		
Date of approval:		
Date of destruction:		

Remember to obtain a destruction certificate if destruction is completed by a third-party.

Appendix B – Appraisal process

