MRC Records Management Policy

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# Records Management Policy

## Version 2.0

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MRC Records Management Policy

Policy statement

The Medical Research Council (MRC) recognises that the effective management of records and documents is necessary to:

- support core business functions and decision making,
- comply with legal and regulatory obligations, and
- contribute to the effective overall management of the organisation.

Records management applies to the creation of reliable, authentic and accessible records and the controlled retention and disposal.

The MRC therefore recognises records management as an essential corporate function and aims to ensure the necessary levels of organisational support to enable its effectiveness and public accountability.
MRC Records Management Policy

Introduction

The aim of this policy is to provide a framework for managing the MRC’s records by setting out practices for the creation, maintenance and disposal of records regardless of the form they are in.

Effective records management ensures that the MRC has access to reliable, authentic and accessible information in a timely manner to support decision-making. The MRC aims to create an environment where:

- records and information are created, managed and protected based on common processes and procedures to ensure quality, authenticity and consistency,
- records are held for as long as necessary for legal, regulatory and business reasons and are disposed of appropriately,
- records can be accessed by appropriate staff and shared securely over time, and,
- all staff are aware of their responsibilities in relation to record-keeping and are trained and supported to carry them out in accordance with this policy.

Records are defined as all information which provides evidence of business activity and for which there are legal, regulatory and business requirements for retention.

Documents are defined as information which is used on an operational or informational basis but that does not have corporate value.

These definitions apply regardless of format of records or documents. Detailed definitions are available in the glossary (section 8).

The MRC is a body covered by the Public Records Acts of 1958 and 1967\(^1\) and is required by law to manage its records in accordance with its legal and regulatory environment. The MRC adheres to the Lord Chancellor’s Code of Practice on Records Management and other relevant records and information management related standards and regulations.

This Policy applies to the management of MRC corporate records in the head offices and the units. The policy is supported by retention schedules relating to core business functions within head office and across the administrative structure throughout the MRC.

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MRC Records Management Policy

1. Principles

The aim of this policy is to define a framework for managing MRC’s records to ensure that the organisation:

- Provides an effective framework for the management of corporate records and documents and delivery of systems and processes, including appropriate staff training,
- Creates and captures accurate, authentic and reliable records that support decision-making processes and policy-making
- Maintains records to meet the MRC’s business needs and to support business as usual processes
- Maintains records to provide evidence of the MRC’s activities and decisions for accountability and transparency
- Disposes of records that are no longer required appropriately
- Identifies and protects vital records to support business continuity
- Conforms to all relevant legal and statutory requirements relating to record-keeping
- Supports information dissemination and sharing across the organisation, and where appropriate with external stakeholders
- Selects records that help capture and access the corporate memory to support greater understanding of MRC’s history, research and structure
- Supports the efficient use of resources of the MRC including staff and systems.

2. Records creation and maintenance

2.1 The MRC is committed to creating and maintaining relevant and accurate records in both paper and electronic format of business activities. Appropriate systems must be in place to document decisions and activities. The records management framework identifies classes of records that need to be captured to document the functions and activities of the organisation.

2.2 Records created by the MRC shall be arranged according to the agreed corporate fileplan. Records must contain metadata in order to be identifiable and accessible, and in order to provide administrative context needed for the effective management of the records.

2.3 All records must be stored in an appropriate records management system. Within the records management system records must be registered and version controlled to ensure authenticity and reliability.

2.4 The head office records management team provides guidance on naming conventions, metadata, indexing, and protective marking of records and the application of corporate value to documents.

2.5 Where the same records are held at both the MRC head office and the MRC units, it is the record held at the MRC head office that is declared as the original and the record held at the MRC units that is declared a copy.
3. Records retention and disposal

3.1 Records must only be retained for as long as they are needed to meet the MRC’s business need, relevant legal and regulatory requirements and appropriate resources. Records retention schedules for each of the MRC’s functions specify the period of time for which each class of records needs to be retained to fulfil these requirements.

3.2 Retention schedules cover each of the core areas of MRC business and have been established for the following functions and can be found in Annex 2:
- Communications
- Corporate Governance
- Estates Management
- Financial Management
- Health and Safety
- Human Resources Management
- Information Management
- Private Office
- Procurement
- Research Programme Management
- Risk, Audit and Internal Control
- Strategy, Evaluation and International Policy
- Unit research management

3.3 Records which demonstrate the significance of the functions and activities of the MRC and which provide information relevant to the public are transferred to The National Archives (TNA) for permanent preservation in time to meet the requirements of the 20-year rule. In addition to corporate governance records and grant files, these records also include proposals relating to the grant or unit funding for major scientific breakthroughs (e.g. proposals relating to the Human Genome Mapping Project), major investments such as the establishment, review and closure of MRC units, files relating to scientific leaders (e.g. Nobel Prize winners, Unit Directors and members of the executive team), and policy development and review. The selection and transfer of corporate records is handled in line with TNA’s Appraisal Policy and its General guidelines for the selection of records.\(^2\)

3.4 Records transferred before 2009 when MRC signed up to the Public Records Act 1958 and 1967 remain MRC records. Records transferred from 2009 are public records. Records that have been selected for permanent preservation at TNA are reviewed, prior to transfer, for sensitivity in regard to the MRC’s obligations under the Data Protection Act 1998, the Environmental Information Regulations 2004 (EIR) and the Freedom of Information Act 2000.

3.5 In compliance with the retention periods stated in the retention schedules, business records that are no longer needed to support business activities, and which are not selected for permanent preservation will be destroyed appropriately, subject to an internal approval process (Annex 3).

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4. Access to records

4.1 All records, both in paper and electronic form, must be maintained and stored in such a way that they can be easily identified and located to support business activities, including access or audit purposes, using established procedures for secure storage and access.

4.2 Any movement of physical or electronic records needs to be controlled and documented in order to ensure a full audit trail and the ability to access records at all times.

4.3 All MRC records must be accessible and retrievable to support the office in responding to requests from individuals who have a legitimate right of access.

5. Responsibilities

5.1 The senior manager with overall responsibility for this policy is the Senior Information Risk Owner (SIRO).

5.2 The Departmental Record Officer (DRO) is responsible for the policy, high level principles and objectives.

5.3 The head office Records Manager is responsible for implementation and the monitoring of compliance within head office, including the development of departmental/group retention schedules and procedures, and the training of staff, and for advising MRC facilities locally.

5.4 Directors are responsible for the compliance of the policy and the application of its principles in their facilities.

5.5 All members of staff are responsible for the proper management of the records they create and use in accordance with the MRC Records Management Policy and guidance relating to records management.

6. Communication and dissemination

6.1 This policy must be provided directly to all staff likely to work with corporate records as part of their induction and training programme.

6.2 The policy is available to all staff via the RCUK SSC Knowledge Base.

6.3 The MRC portal contains a records management section where all key records management policies, procedures and guidance are published and regularly updated by the records management team.
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7. Records management assurance

7.1 Control mechanisms in place to ensure that the MRC records management policy is correctly applied and processes are implemented appropriately are listed below in 7.2 to 7.4.

7.2 Records retention schedules are developed in consultation with stakeholders across the MRC. Retention schedules provide clear guidance on how long to retain corporate information based on legal and business requirements.

7.3 Agreed retention schedules are applied to all the MRC’s corporate records.

7.4 Compliance with records management policies and procedures is reported in the Director’s Annual Statement of Internal Control (DASIC).

8. Glossary and definitions

8.1 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. The following is a non-exhaustive list of examples of paper and electronic records usually found at the MRC:

For MRC head office:
- Council (and its subcommittees), board and panel agendas and minutes
- Policies, contracts, grants, and personnel files
- Important correspondence with stakeholders and customers
- Reports such as the annual report or project reports
- Financial information such as budgets, invoices, and statements
- Databases, sound and video files
- Electronic mail messages (e-mail) that document a business decision or transaction
- Internet and intranet web pages
- Maps, plans or photographs

For MRC units and institutes:
- Board minutes, papers and agendas
- Corporate or project reports
- Policies, SoPs and contracts
- Grant and other funding applications and agreements
- Research data
- Lab notebooks
- Health and Safety assessments
- Intellectual Property files
- Personal or project animal licences
- Corporate web pages
8.2 *Documents* are sets of recorded information that have not or not yet been assigned corporate value (for example drafts, meeting notes, staff holiday schedules etc.) because they do not need to be kept for legal or regulatory reasons and only have operational value for the organisation.

8.3 *Vital records* are records without which the organisation could not function. They are essential records that are necessary to document and protect corporate assets, obligations and resources of MRC and include deeds, contracts, financial, employee and customer information.

8.4 *Records management* is the field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records.

8.5 *Classification* is the process of devising and applying schemes based on the business activities which generate records, whereby they are categorised in systematic and consistent ways to facilitate their capture, retrieval, maintenance and disposal.

8.6 *Disposal* is the process associated with the implementation of appraisal decisions including the retention, deletion or destruction of records.

8.7 *Retention* is the process of determining how long a particular class of records needs to be retained for compliance or business reasons. (This could be either in MRC systems (including off-site storage) or at TNA).

8.8 *Departmental Record Officer* (DRO). As an organisation signed up to the Public Records Act 1958, the MRC holds the responsibility for the management of its public records, and must appoint a departmental record officer who is responsible for the care of all its records (including electronic records).

8.9 *Records management system* is an intellectual concept that refers to a coherent and consistent approach to managing records throughout their lifecycle. A records management system comprises all policies, processes, procedures and systems that are used by an organisation to manage information. It is not automatically associated with an ERMS but can refer to the management of information on shared drives or a set of guidance for users on how to manage emails and documents in general.

8.10 *Corporate value* is the term used to denote that a document is a corporate record and needs to be retained for a set period due to legal, regulatory or business requirements. A document becomes a record in the electronic environment of ERMS when corporate value is selected. All records have corporate value and should not be altered, accessed or deleted without authorisation and audit trail to document changes because responsibility for their management is passed to the organisation.

9. **Related documents**

9.1 MRC policies and guidance
- MRC Code of Conduct for Employees
- RCUK Code of Conduct Policy (for Head Office staff)
- MRC Data Protection Policy
- MRC Information Security Policy
- MRC Good Research Practice Guidelines
- Unit Closure Guidance
- University Units Transfer Toolkit
- Health and Safety Requirements for Recordkeeping
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9.2 Legislation and statutory requirements
   - Data Protection Act 1998 (DPA)
   - Freedom of Information Act 2000 (FOIA)
   - Environmental Information Regulations 2004 (EIR)
   - Reuse of Public Sector Information Regulations 2005
   - 20-year rule

9.3 Professional standards
   - ISO15489-1:2001 Information and documentation – Records Management

Additional legislation specific to MRC functions and processes is listed in the retention schedules.

10. Effective date

10.1 This policy is effective from 16th January 2013

11. Review date

11.1 This policy will be formally reviewed in January 2019.

12. Amendment history

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13. Annex 1 Overview of Retention schedules

Records retention schedules are created for the following MRC functions and a full version will be attached to the policy when they have been formally approved by the MRC Operations Board:

Communication

The communications retention schedule relates to the function of raising and maintaining the MRC’s public profile and of publishing information about or relating to the MRC for the public and/or internally. The schedule includes publications, internal and external relations records.

Corporate Governance

The corporate governance retention schedule relates to the function of strategic management and planning for the delivery of MRC’s business objectives. The schedule includes retention periods for Council, Council sub-committees and Research Board meeting records as well as MRC corporate policy and planning documentation.

Estates Management

The estates management retention schedule relates to the function of managing the working, storage and living space within premises as well as the acquiring, constructing, maintaining and disposing of property. The schedule includes property maintenance, management and evaluation records, facilities management and project management records.

Financial Management

The financial management retention schedule relates to the function of managing MRC’s financial resources. The schedule includes contractual records, management, statutory and financial accounting records, audit and asset management records as well as payroll records.

Health and Safety

The health and safety retention schedule relates to the function of implementing and coordinating health and safety standards and requirements to which the MRC is either subject or voluntarily abides. The schedule includes accidents and incidents, reporting, training, occupational health, audit and inspection, scientific premises and plant and equipment records.

Human Resources

The human resources retention schedule relates to the function of managing all employee matters at the MRC. The schedule includes personnel files, recruitment, contracts, absence, occupational health, employee relations, rewards and pensions records.

Information Management

The information management retention schedule relates to the function of managing MRC’s information resources. The schedule includes Data Protection and Freedom of Information, ERP and science reporting, IT service delivery, knowledge management and records and archives management records.

Private Office
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The Private Office retention schedule relates to the management of the Chief Executive’s and Chief Operating Officer’s diary, correspondence and meetings. The schedule contains diaries, correspondence, and meeting and project records.

Procurement

The procurement retention schedule relates to the function of providing favourable conditions under which goods, services or construction projects can be obtained from third parties. The schedule includes tendering, contract operation and monitoring records.

Research Programme Management

The research programme management retention schedule relates to the function of assessing, awarding and monitoring funding for scientific research, units, centres and institutes. The schedule includes grants and research training management, units and large scale-investment records.

Risk, Audit and Internal Control

The risk, audit and internal control retention schedule relates to the function of assessing, monitoring and managing the financial, legal and reputational risk of the MRC. The schedule includes risk and project risk management, audit and internal control records.

Strategy, Evaluation and International Policy

The strategy, evaluation and international policy retention schedule relates to the function of developing, maintaining and evaluating MRC corporate strategy and international policy. The schedule includes research strategy, corporate reports and analysis as well as overseas office administration records.

Unit Research Management

The unit research management retention schedule relates to the function of managing primary research records and of applying for funding. The schedule includes various types of primary research records, applications to and agreements with funders.

Attached separately.

15. Annex 3: Approval process for appraisal decisions at head office

Records that have a retention action called ‘appraise’ will be appraised at regular specified intervals, normally annually by an appraisal team that consists of a member of the records management team, the senior information officer and members of the Directorate which owns the records for appraisal.

The appraisal team will consider the value of records for continued business use and historical value based on agreed appraisal criteria (Annex 4).

Once a decision has been reached by the appraisal team, the records management team member will inform the Departmental Records Officer (DRO) of the outcome with a list of records that have been appraised and the suggested appraisal action (e.g. transfer to The National Archives or destroy).

The DRO will either recommend the suggestion made by the appraisal team to the Senior Information Risk Owner (SIRO) for final approval or refer it back to the appraisal team with any questions or comments.

Should the appraisal team be unable to reach a unanimous decision, the diverging opinions will be presented to the DRO by the records management team member. The DRO (if necessary in consultation with the relevant Director) will review the case and make a recommendation to the SIRO.

The SIRO has final approval for all appraisal decisions and will sign the list of records having been appraised and their corresponding appraisal actions.

The records management team will action all appraisal decisions in accordance with internal procedures.

Appraisal approval process flowchart:
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Retention end date is triggered

Retention action is 'appraise'

Appraisal team:
RM rep
FOI rep
Subject specialists

Make recommendation based on appraisal criteria, e.g.:
PI expertise
Research subject
Historical value
Continued business value
...

DRO

Diverging opinions

Questions/comments to appraisal team

Advice from relevant Director

Make recommendation

Unanimous decision

DRO disagrees

DRO agrees

Recommendation and list of records to SIRO

SIRO signs off decision

RM team carry out decision: Destroy or transfer to TNA
16. Annex 4: Application of retention process at head office

Retention period will be applied to MRC’s corporate records, both paper and electronic, as described in the retention schedules and when a retention period comes to an end, the following process will be initiated:

17. Annex 5: Appraisal criteria

To be completed once the implementation process of the retention schedules starts in consultation with The National Archives and function leads.