



UCFB* Records Management Policy

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*UCFB is trading name of University Campus of Football Business Limited

1. Introduction

This Policy forms part of a suite of policies and procedures that support a data protection framework, aligned with BSI BS10012:2017 – a British information security standard to manage the risks to the privacy of personal data and implement the necessary policies, procedures and controls to help ensure compliance with the UK GDPR and Data (Use and Access) Act 2025 (DUAA).

A record is defined in the Records Management British Standard ISO15489 as: “Information created, received and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business”. All records created and held by UCFB, both paper and digital, (including email and information held in databases) are subject to this Policy.

Records are an important asset to UCFB and they require appropriate management for effective and efficient administration, for the discharge of UCFB responsibilities and business, and for compliance with legislative requirements. Good management of records also helps staff in the performance of their duties by improving access to and organisation of relevant records, removing out of date or superseded records from UCFB systems and reducing duplication of documents and data. There are also several sets of legislation which impact on the way in which UCFB manages information. Non-compliance with this legislation carries financial and reputational penalties.

2. Purpose

UCFB records are defined as those documents or data sets which arise from or facilitate the business carried out by UCFB and which provide evidence of its transactions or activities. This Policy aims to ensure that UCFB creates, maintains, retains and properly disposes of those records which it requires for the conduct of its business and that they are managed in a manner commensurate with legal obligations and information requirements. UCFB acknowledges the legislative environment within which it operates, particularly in the context of this Policy, those pieces of legislation, related codes of practice and standards listed below. These all have implications for the way in which public authorities are expected to keep records and apply records management standards. This will be achieved through the implementation of controls and responsibilities including measures to ensure:

- Legislative compliance - compliance with record keeping provisions in current legislation such as the Freedom of Information Act, the Data Protection Act and the Environmental Information Regulations;
- Information lifecycle management – records must be kept for an appropriate length of time and in an appropriate manner. They must be disposed of at the end of their lifecycle in accordance with policies, procedures and best practice and in accordance with the [UCFB Records Lifecycle Management Scheme](#);
- Confidentiality – UCFB records must be protected from unauthorised access;
- Integrity – the accuracy and completeness of UCFB records must be safeguarded and unauthorised amendment or destruction prevented;
- Availability – UCFB records must be available to authorised users in line with business and funding body requirements;
- Efficiency – UCFB records must be available to authorised users in a form that ensures efficiency and ease of use;
- Authentication – the identity of the persons accessing highly restricted and critical systems which permit the creation, amendment or deletion of UCFB records must be recorded and verifiable; and
- Semi-current manual records (records which are not in regular use, but which have not yet reached their disposal date) will be managed, where appropriate, by the relevant Dean, Deputy Dean and/or Director/Head of Service.

3. Scope

This Policy applies to:

- All UCFB records;
- Research records, whether internally or externally funded are included, as are records sent or received through the email system;
- All members of staff, as well as individuals conducting work at or for UCFB and/or its subsidiaries, who have access to UCFB information (“staff”) and this includes temporary, honorary, visiting, casual, voluntary and agency workers, students employed by UCFB and suppliers (this list is not intended to be exhaustive); and
- All locations from which UCFB information is accessed, including off-campus locations.

4. Responsibilities and Compliance Framework

UCFB has a corporate responsibility to maintain its records and records management systems in accordance with the regulatory environment. This responsibility therefore extends to all staff who work with UCFB records. Email must not be used for storing UCFB records. Any email that is important and needs to be retained must be stored elsewhere in an appropriate filing system relevant to their confidentiality, criticality or data classification. Deans, Deputy Deans, Directors/Heads of Service or equivalent are responsible for ensuring that records management within their areas is carried out in line with this Policy and established procedures. To assist with this, UCFB has identified a Data Privacy Team across all organisational units, areas and Academic Centres. The Data Privacy Team is responsible for helping to ensure that: records are managed; that policies, procedures, guidance and advice in support of this Policy and wider data protection are provided; and that training for staff, including where necessary to demonstrate ongoing regulatory compliance with laws associated with the management of information including Data Protection, Freedom of Information and e-Privacy are provided.

5. Monitoring Compliance

The UCFB data protection framework and its associated policies are subject to internal monitoring and auditing throughout UCFB, and the outcomes from these processes will inform and improve practices as part of a commitment to continuous improvement. UCFB will also undertake appropriate benchmarking and this Policy will be audited by external bodies. Reports on the matters related to all policies within the data protection framework will be provided to the UCFB Board of Directors.

6. Related Policies and Procedures

- [UCFB Group CCTV Policy](#)
- [UCFB Records Lifecycle Management Scheme](#)
- [UCFB Data Protection Policy](#)
- [UCFB Data Privacy Notice](#)
- [UCFB Information Security Policy](#)