

Guidance on Keeping Manual Files

1. Introduction

The following excerpts are taken from the **University Policy on Records Management**, produced by the University Secretary & Registrar's Directorate in 2009. The policy was developed to ensure good practice in managing records including all manual files.

The Data Protection Act 1998, which came into force on 1 March 2000, extends protection of individuals' personal data held by an organisation to data in certain types of manual filing systems such as folders in filing cabinets. The University has decided to treat all manual files containing personal data as being covered by the Act and to adopt best practice contained in 8 principles of good data handling. Where a file contains personal data* the University should follow these principles:

**Personal data is information about an identifiable person. An identifiable person is someone who can be identified either directly or indirectly from the data*

1. Processed in a fair and lawful way (various conditions must be met.)
2. Limitation of purpose - data should be obtained for one or more specified and lawful purposes.
3. Adequate, relevant and not excessive.
4. Accurate and, where necessary, kept up-to-date.
5. Only kept as long as needed.
6. Processed in accordance with the rights of data subjects.
7. Secure.
8. Not transferred outside the European Economic Area (EEA) unless that country ensures an adequate level of protection for the rights and freedoms of data subjects.

The Freedom of Information Act 2000 - The FOIA gives members of the public the right to access information held by public authorities who are required to put into place adequate records management practices in order that they are able to comply with the requirements of the Act.

Additionally the University may also receive **Subject Access Requests**, which are information searches against an individual. This covers employees or students (past or present).

Guidance is provided below on managing active files (i.e. information required for regular use to meet business need), advice on regular weeding of file contents and guidance to individual staff members on managing their personal files.

2. Active Files Management

What are active files?

Active files are those records kept on hand in the office for **regular** use in conducting business. FD considers the definition of 'active files' as those that relate to:

- Current academic year
- Previous academic year
- Future academic years (e.g. planning)

Guidelines on managing active files

The following principles are recommended for managing active files, although it is recognised that local managers may have specific requirements dependent on the content.

1. Access improves when a small number of physical **thin files** with specific contents are used rather than a few huge physical files with broader general contents. These files can then be grouped according to subject content. It should always be considered whether these files can be kept electronically therefore reducing the need of physical storage.
2. **Avoid duplication** of records; avoid the retention of drafts and multiple copies. Regular review of file contents and weeding helps prevent duplication and retention of records that are not needed. If an electronic copy of a record exists there is no need to keep a physical backup in the majority of cases, unless a 'wet' signature copy is required.
3. **Distinguish between substantive** records (including correspondence, reports and memoranda) **and routine documents** (ones whose usefulness ends after they serve their immediate purpose). For example, a letter describing a University policy is substantive, but one requesting a copy of a brochure is routine. Both forms of this type of record are likely to have been produced electronically so avoid the need to physically store.
4. **Compile a guide** or inventory of files and records retained in the office. Ideally, this should be a list of core folders held in each storage unit and include the location and a brief summary of the content. A unique identifier of the storage unit should also be assigned. The inventory held should be reviewed at least annually so it will be current and accurate.

All other files that should be retained, but will not necessarily be referred to on a regular basis, should be archived.

Guidance will be provided to those teams or individuals embarking on archiving/retrieval for the first time and archiving boxes made available. ([Please refer to section four below](#)).

5. **Identify vital records**. These are irreplaceable materials that would be necessary to start the operation again after a destructive disaster or

physically copies of documents that would be required to ensure business continuity.

Due to the nature of these records where possible both a physical and electronic copy should be kept.

Examples of such vital records include a business continuity plan, organisational charts, and confidential personnel records. Give particular attention to documents that exist in only one copy. Identify vital records in your inventory.

6. **Designate a records officer** who is responsible for the implementation of records policies and for co-ordination of Faculty/School/Department records. Sandra Stephens provides this role on behalf of the Directorate.

3. Guidelines for weeding records

Records/files should be reviewed regularly for items that may be discarded. Regular weeding of files saves space and leads to faster and more efficient retrieval of records. When weeding files you should consider discarding the following categories of materials.

- a. **Drafts.** You should retain only the final version of a document. Retain paper copies of drafts only when significant comments or annotations appear. Alternatively, consider using the version control on documents in SharePoint to avoid the saving of multiple versions.
- b. **Routine correspondence.** You may discard cover letters that merely forward an enclosure and add nothing to the content of the item transmitted; meeting announcements; address changes; invitations; acknowledgements; reservation; confirmations; travel itineraries; and routine requests for general information such as brochures once they have reached the end of their usefulness.
- c. **Memoranda.** Only retain memoranda that concern policies, procedures and capital investments where electronic copies do not exist.
- d. **Duplicated records.** You may discard records that have been duplicated in another format, provided that the duplicate's accuracy has been verified and that it is retained as the record copy e.g. a paper record scanned. Paper documents should be retained where an original (sometimes referred to as 'wet') signature is required.
- e. **Miscellaneous.** You may discard multiple copies of documents created and preserved only for ease of reference; catalogues; advertisements and promotional materials except those originating from your department; and obsolete equipment manuals and warranties.

You should also refer to the document retention schedule for guidance on suggested retention periods for key University records.

4. Facilities Directorate Central Archive

The Facilities Directorate currently provides a Central Archive which allows storage of files away from working areas. Only documents should be put forward for archiving where there is a genuine business purpose for retaining them (refer to the records retention schedule and guidelines for weeding, [see section 3 above](#)).

An on-line archive application system (myArchive) can be found at:

<https://staff.shu.ac.uk/fdr/fm/archiving.asp>.

Teams should systematically review their documents before sending for archive storage and periodically during the storage lifetime.

It is recommended to perform the archiving procedure at the end of an academic year.

5. Guidelines on managing personal papers/files

Some documentary materials accumulated by University employees do not qualify as University records. These materials may be considered personal papers if they relate to an individual's personal affairs and do not affect the conduct of University business or if the document relates to an individual's work but does not form the University records. These are most commonly stored in individual's desk pedestal / locker. Examples include:

- papers accumulated by an employee before joining SHU;
- materials relating solely to an individual's private affairs, such as professional pursuits, professional affiliations;
- personal correspondence, or other personal notes that are not prepared or received in the process of transacting University business;
- individuals payroll information and monthly payroll statements;
- personal career develop documents and copies of training materials.

With some exceptions, the records described above are not University records and the management of these is your personal responsibility. Employees are discouraged from retaining non-work related personal items on University premises due to space constraints but it is recognised that it may be necessary to retain some personal items at the University. If employees do maintain personal files in their offices, the files should be separated from University records. When both private matters and University business appear in the same document, you should extract or copy the part relating to University business and treat the extraction or copy as a University record.

Agendas, minutes, printed materials relating to meetings should not be retained by individuals as this creates multiple copies.

Committee records should be retained for and by the University and are the responsibility of the committee Chair/Secretary, the recommended method of retention is by electronic means (e.g. SharePoint team site)