Top Tips for a Successful Information ‘Spring Clean’

Good compliance with data protection relies on proactively managing information. These top tips outline some of the key things to consider when you’re reviewing the information you hold.

1. Identify what information you hold

Make a record of the information you’re holding. The best way to do this (which will also meet other GDPR requirements) if to carry out a data mapping exercise to identify what ‘assets’ you hold. This process will take some time but will give you really useful information to base your decisions on. If you have a dedicated record storage location and would like some support and guidance on carrying out a physical survey of what you hold then contact the University Records Manager for more information.

2. Are you holding ‘the record’ or just a duplicate?

Check with central teams such as HR and Finance whether they hold the definitive ‘record’ and whether you even need to keep a local copy. Consider if you are the ‘process owner’, if not then it’s likely that you’re just holding a local copy.

3. Identify whether you need to keep the information or not?

Will the information be needed for a potential operational, legal, accountability, or historical purpose sometime in the future? If so then it’s highly likely that you’ll still need to keep the information.

4. Find out how long the information should be retained for

Consult the University retention schedules which will list the various types of information the University holds and for how long that information should be retained for. If you cannot find the information you need then please have a conversation with the University Records Manager who will be able to advise you on how long the information might need to be retained for.

5. If you’re able to destroy the information according to the retention schedule how do you go about doing this?

Make sure you dispose of any personal or confidential information in a secure way. Please consult the Waste and Recycling pages to find dates and times of collections and information on how to obtain shredding bags.

6. Where to store hard copy information

In general terms if you still need to use information regularly then it’s best practice to store it securely in your offices. You may be fortunate enough to have dedicated storage space on campus you can use – if so make sure you actively manage these spaces and maintain an inventory of their contents.

If you still need to keep some information but it doesn’t need to be consulted on a regular basis then the University’s off-site document storage solution might be the best option for you. Further information on possible storage options can be found here.

Myth Busting

Data Protection means I can’t hold anything in paper format?

No! GDPR makes no reference to the format of information so long as it’s managed securely.
Is scanning a solution to all my recordkeeping problems?

Although scanning can often seem an ideal solution to storing information it is not as straightforward as it may seem. If the information may be needed in a compliance situation it needs to be scanned in accordance with BS10008:2014 (the British Standard on legal admissibility of scanned information) to make it legally admissible as evidence. Also, there are no guarantees around the long term preservation of digital information, so if you’re likely to need it for a long time (or even permanently) keep it in its original format.

How should I store my electronic records?

The same broad principles apply to the storage of electronic records. In the main you should know where the information is held; store it with appropriate access permissions; and ensure there is a review/disposal date on the folders. If you’re concerned about emails see our Top Tips on Email Management Document.

What to do about information that should or may need to be retained permanently

Some records can and should be retained permanently as indicated in the retention schedule. If you have identified records that need permanent preservation or you think some might need preserving then contact the University Archivist for advice.

Myth Busting

Data Protection means I can never keep information permanently?

No. GDPR carries an exemption for “archiving in the public interest” which means that some information can be retained permanently.

Further information:

- If you need further information or have questions about recordkeeping issues please email the Records Management Service on records.management@le.ac.uk or see our records management pages which are available at: https://www2.le.ac.uk/offices/ias/records
- Further guidance on preparing for the General Data Protection Regulations is available at: https://www.le.ac.uk/gdpr