InterPARES Trust Research Report

Team Europe EU32-2 Project 2016-2018: The Role of the Records Manager/Records Management in an Open Government Environment in the UK: higher education

Does one size fit all? Exploring records management in the UK Higher Education sector

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ABSTRACT

Purpose

The purpose of this research is to understand the drivers behind, and practice of, records management (RM) within Higher Education (HE) institutions. This thesis will explore the areas of legislation, and the role of the records manager in the unique context of the HE sector.

Design/Methodology/Approach

This research was conducted using semi-structured/guided interviews with four HE institutions of varying sizes, ages and geographic locations. The interviews were conducted in person and over the phone. The interviews were fully transcribed, and the data analysed using the Grounded Theory techniques of open and axial coding to draw conclusions across the four participants.

Findings

Electronic recordkeeping presents the biggest challenge in the HE sector. Records professionals are facing obstacles in the organisational culture and structure, resource and engagement from the wider staff as well as the exponential increase in the numbers of systems used by the institutions and the amount of digital information created. Institutions adapt their approaches to both paper and electronic records management, utilising sector guidance as a foundation. The current sector guidance is outdated and not fit-for purpose in its current iteration and a review would be welcomed by the sector. External drivers still play the biggest part in providing resource to move records management in HE forward. High-profile information access legislation, including the new General Data Protection Regulation (GDPR), presents opportunities to capitalise on awareness at all levels of the organisation to push for changes and investment in records management. The role of the records

professional continues to evolve and adapt to absorb new information compliance work ensuring ongoing relevance in the changing environment of HE. Records professionals need to continue to develop their digital skills to face the ever-increasing requirements around electronic recordkeeping.

Research limitations/implications

This study was an exploratory piece of work to create a discussion around RM in HE and generate possible areas of further study. The study was small and as result the findings are difficult to generalise. The study was only focused on the UK but links to other countries are referenced in the literature review. RDM was not a focus although the question was asked in the interviews to gain a general understanding of attitudes of participants.

Originality

This study builds on two key pieces of research completed in the Higher Education sector in the UK in relation to records management. The research adds to a picture of records management in HE and aims to provide an updated, holistic overview of the current situation in this area.

Keywords

Records management; Higher Education; Education; Legislation; Information management; Electronic records, Information systems, Information governance, Information compliance, Records lifecycle, Public-sector.

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List of abbreviations and acronyms

BCS – Business Classification Scheme

DP – Data Protection

EDRMS – Electronic Document and Record Management System

ERM – Electronic Records Management

FoI – Freedom of Information

HE/HEI – Higher Education/Higher Education Institution

HESA – Higher Education Statistics Agency

IM – Information Management

Jisc – Joint Information Systems Committee

RDM – Research Data Management

RM – Records Management

Chapter 1 – Introduction

It has been forty years since Bott and Edwards completed their initial survey of records management in UK universities and almost seventeen years since Margaret Procter, when reviewing records management practices, stated that 'the possibility of uniform good practice throughout the [Higher Education] sector now appears a realistic prospect'.[1] Bott and Edwards conducted their study shortly after the expansion in numbers of UK universities during the period known as 'plateglass universities' around the time of the Robbins Report in the 1960s.[2] The UK higher education sector has seen such increases again following the passing of the Further and Higher Education Act 1992 and in the second wave of these new universities in the 2000s.[3] Drawing on some of the issues raised by Procter in 2002 and building on Bott and Edwards' survey, this study aims to gain the perspectives of those with responsibility for implementing and maintaining records management programmes in UK Higher Education (HE) institutions.

The unique situation in which UK Higher Education institutions (HEIs) find themselves establishes this sector as one worthy of further research. A report published in 2017 by Universities UK states that "UK universities, together with their international students and visitors, generated £95 billion of gross output in the economy in 2014-15" along with providing international and domestic research links.[4] Procter describes universities as "decentralised, loose, and often monolithic

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[1] Michael. Bott and J. A. Edwards, *Records Management in British Universities : A Survey with Some Suggestions* (The Library, University of Reading, 1978); Margaret Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," *Records Management Journal* 12, no. 2 (2002): 53, https://doi.org/10.1108/0956569021044291760.

[2] The term was coined by Michael Beloff in his 1970 book 'The Plateglass Universities'.

[3] Need a reference that's not wikipedia

[4] Andy Logan, "The Economic Impact of Universities in 2014-15 Report for Universities Uk," *Oxford Economics*, 2017, 1, https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2017/the-economic-impact-of-universities.pdf.

structures".[5] Common characteristics within the HE sector, as outlined in Procter's

2002 article, include geography, individual academic freedom, the lack of

professionals in records management (RM) posts, the legislation which mandates

them and the practical tools in development at the time of her writing.[6] There is little

mention of digital records in the article outside of the use of electronic document

management systems (EDRMS) and a growing, but still marginal, acknowledgement

of the need to manage electronic records and media.[7] These core issues are

reflected in the available literature on records management in UK HEIs and around

the world, although contributions to academic journals about records management in

countries such as Canada and Turkey, Nigeria and Malaysia have been noticeably

higher than in the UK over the past fifteen years.[8]

Procter's article remains one of the few comprehensive sources on the

subject of RM specifically in the HE sector. Whilst the HE sector has a public sector

profile, it operates under different funding frameworks and with differing focuses and

mandates, for example research data management. The more general concerns of

the public sector around access legislation, as identified by Shepherd in local

government, are applicable in HE but do not provide detailed insight into the unique

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[5] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 53.

[6] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education."

[7] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 51.

[8] Enemute Basil Iwhiwhu, "Management of Records in Nigerian Universities: Problems and Prospects," *The Electronic Library* 23, no. 3 (2005): 345–55, https://doi.org/10.1108/02640470510603741//doi.org/10.1108/09565690310485315%22%3Ehttps://; Eze Asogwa Brendan, "The Readiness of Universities in Managing Electronic Records: A Study of Three Federal Universities in Nigeria," *The Electronic Library* 31, no. 6 (2013): 792–807, https://doi.org/10.1108/EL-04-2012-0037; Shah Jahan Miah and Ahmad Zam Hariro Samsudin, "EDRMS for Academic Records Management: A Design Study in a Malaysian University," *Education Information Technology2* 22 (2017): 1895–1910, doi:10.1007/s10639-016-9525-6; Ozgur Kulku, "Records Management Practices in Universities : A Comparative Study of Examies in Canada and Turkey," *La Revue Canadienne Des Sciences de l'information et de Bibliothéconomie* 33, no. 1/2 (2009): 85–107; Guillermo Eduardo Fiebelkorn, "Why Does It Take So Long? Implementing Electronic Records Programs at Universities" 2012, https://search.proquest.com/docview/1314798816?fromunauthdoc=true.

situation highlighted above.[9] This study aims to investigate the concerns within the UK HE sector today, providing at least comparative qualitative data which will situate HE as a separate concern within the wider public sector debate.

Methodology

Research aim

This research aims to explore the drivers behind and practice of records management within HE institutions (HEIs). Underpinning the research aim the objectives of this research are:

- to investigate the current records management situation within HE including who is undertaking the role of Records Manager.

- To seek to understand how the records management function is delivered in practice day-to-day.

- To identify what the key drivers are behind the function.

- The research also aims to scope future opportunities in records management within HE as perceived by the practitioners.

Literature review

A literature review was undertaken to frame the research and confirm prior work in the area. An appendix of literature search terms and journals can be found at the end of the study (appendix A). Search terms were modified as the searching progressed to ensure the capture of all possible sources. Bibliographies of consulted sources were also checked for additional items. The University College London library database was used and the primary journals searched were the Records

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Management Journal, The Information Management Journal and The International

Journal of Information Management. Practical sources identified in the academic

literature were followed up, and searches of Jisc's online resource database were

conducted for HE specific resources.

Desk-based research, qualitative interviews and data analysis

Searches were conducted of the records and information policies on the

websites for universities listed on the HESA website. Available information from the

institution's website about the current records management function was recorded

on a spreadsheet. This information included the regional location of the institution,

institution population, whether they have records management documentation

publicly available on their website, where the RM programme (if it exists) sits within

the organisation, whether they have an RM policy, a retention schedule or part of a

retention schedule, if the available documents mention Jisc, and whether the

institution has an archive or special collections service. The Complete University

Guide's population brackets were then used to identify the small, medium, large and

largest institutions.[10] Data collection was primarily carried out by means of semi-

structured/guided interviews. Potential institutions were identified from purposeful,

priori criteria sampling using the HESA lists of institutions to give structure to

choosing participants, however, institutions were also identified from secondary

literature and from contacts through the UCL course.[11] Criteria used for sampling

was institutions of varying sizes, geographical locations and ages. This approach

addressed the fact that within the specific sector culture of academic freedom, and

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[10] "University of Cambridge - Complete University Guide," accessed November 6, 2018,
https://www.thecompleteuniversityguide.co.uk/cambridge/.
[11] Alison Jane Pickard, *Research Methods in Information* (London: London : Facet, 2007), 64-67.

democratic organisational structure, there exist local differences which merit their own consideration. Initial contact was via the email address found on the website of the institution or provided by a contact at the institution itself. Interviews were conducted both in person and over the phone. Where the interview was conducted over the phone this has been made apparent in the title of the transcript included in the appendix to address any impact this may have had on the responses given. The use of semi-structured interviews enabled participants to "tell their own story in their own words" whilst ensuring "all relevant areas of the topic are covered".[12] Prompt questions were asked if there was a particularly interesting idea raised or if a specific area wasn't discussed as much. Transcribed interviews were analysed using Grounded Theory open coding to ensure rigorous analysis and deconstruction of the raw data, and axial coding to allow links to naturally evolve across the categories.[13]

Questions for the interview were loosely based around those of the original survey conducted by Bott and Edwards in 1978. A full list of interview questions is included as appendix B.

Research ethics

I am currently working in a HE institution and at the time of writing was studying at one. I made a conscious decision to address the potential impact of bias on the study. There is also an inherent bias towards the southern institutions owing to the location of the researcher and the available time to complete the study

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[12] Pickard, *Research Methods in Information*, 199-200.

[13] Graham R. Gibbs, *Grounded Theory - Line-by-Line Coding - YouTube*, accessed August 26, 2018, https://www.youtube.com/watch?v=Dfd_U-24egg; Graham R. Gibbs, *Grounded Theory - Open Coding Part 2 - YouTube*, accessed August 12, 2018, https://www.youtube.com/watch?v=vi5B7Zo0_OE; Tiffany Gallicano, "An Example of How to Perform Open Coding, Axial Coding and Selective Coding," *The PR Post*, 2013, https://prpost.wordpress.com/2013/07/22/an-example-of-how-to-perform-open-coding-axial-coding-and-selective-coding/; Lucia Benaquisto, "Open Coding," *The SAGE Encyclopedia of Qualitative Research Methods*, 2012, doi:10.4135/9781412963909; Pickard, *Research Methods in Information*, 269-277.

Prior consent was sought from participants before interviews were conducted. An information sheet and consent form were provided to the participant to confirm that they had understood and consented to all aspects of the interview process. Participants were given a choice of either acknowledgement or anonymity. The transcripts were anonymised both by removing the name and the identifiable institutional context and participants described as 'they' and a copy was sent to the participant to check the anonymisation and for clarification and minor amendments. Individuals interviewed were assigned a random unique number which was used to reference both the participant and their institution. Discourse markers were removed from the full transcripts and quotes for ease of reading. Despite references in the findings section, the transcript for Institution 4 has not been included in full as an appendix at the request of the participant.

Chapter 2 – Literature Review

Records Management in UK Universities

Margaret Procter's 2002 article entitled 'One size does not fit all' is arguably one of the last holistic pieces of academic research focused on records management within the Higher Education sector in the UK in the last fifteen years.[14] There is a lack of recent comprehensive research in the UK in this area despite the unique organisational culture and economic profitability this sector holds. Procter's article highlights what could be considered the first concerted effort to draw a conclusion on the overall state of the records management function in UK universities, a survey by Bott and Edwards of the University of Reading in 1978.[15] Following this, despite work done by SCONUL, the dearth of research during the last decade and a half is difficult to explain considering the significant changes in how we create, manage and keep records and information. This void is particularly interesting considering developments in the digital landscape, and in the impact this has on data, privacy and research for which this sector is particularly important.

Despite the wave of work done during the introductory years of UK access legislation one of the core studies about records management in this area was done before access legislation became a key component. Bott and Edwards of the University of Reading completed and published a 'survey with some suggestions' in 1978 in which they stressed the importance of having dedicated staff to oversee the function, the need to assess costs, the need for resource and the position of the staff within the institution carrying out the function.[16] They also emphasised the need for

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[14] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education."

[15] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*.

[16] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 1-22.

disposal of records and were ahead of their time in the division of a sector specific retention schedule.[17] Top-management buy-in and support is not only stressed in their introduction to the survey but is evident in the support of the Vice-Chancellor of Reading at the time in his written preface.[18]

Some of the origins of the survey, beginning with the drivers and institutional support required to implement a records management function are much the same in the more recent literature as they were then, for example, this need for high-level support is shared by Shepherd and Ennion and Screene.[19]

Procter highlights that, other than the work completed by SCONUL a decade later in 1989, Bott and Edwards' study is the only truly comprehensive work of its kind.[20] Bott and Edwards work was a survey of fifty-six SCONUL university members during a time when records management was considered a reasonably new concept, influenced by developments in North America.[21] The records survey was echoed later in 1990 by Skemer and Williams in the US.[22] Compliance was still a driver contextually and the schedule still addressed financial and legal legislation whilst ensuring that records important to building both the corporate memory and historical picture of the institution were kept. However, Bott and Edwards' survey outlines the issues unique to the organisational culture of the Higher Education sector referencing academic freedom and autonomy, a democratic structure and a focus on

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[17] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 27-32.

[18] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 1-2, 27.

[19] Elizabeth Shepherd and Elizabeth Ennion, "How Has the Implementation of the UK Freedom of Information Act 2000 Affected Archives and Records Management Services?," *Records Management Journal* 17, no. 1 (2007): 38-39, doi:10.1108/09565690710730688; Lorraine Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?," *Records Management Journal* 15, no. 1 (2005): 35-36, doi:10.1108/09565690510585411.

[20] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 49.

[21] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 1-3.

[22] Don C Skemer and Geoffrey P Williams, "Managing the Records of Higher Education: The State of Records Management in American Colleges and Universities," *Source: The American Archivist American Archivist* 53, no. 53 (1990): 532–47, http://www.jstor.org/stable/40293495.

research.[23] This culture is highlighted again by Procter and McLeod and Lappin.[24] Several studies, including some recent work in the UK and around the world, have been done to identify the effect organisational culture has on records and information management.[25]

<u>Records Management in Higher Education and the Wider Public Sector</u>

In the literature, Higher Education institutions are often discussed and researched under the same umbrella as other public-sector institutions. The shared information legislation context, not present in the time of Bott and Edwards, often means that research which is applicable to the wider public sector is extended to include the Higher Education sector. However, the difference in approach towards access legislation compliance and wider initiatives for health and governmental organisations, particularly around digital working, implies that the Higher Education sector should be a separate concern and presents research opportunities of its own.[26]

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[23] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions, 3, 9-10*.

[24] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 52; James Lappin and Julie Mcleod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions Final Report," 2010, 3, http://www.northumbria.ac.uk/sharepoint_study; James Lappin and Julie McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review," 2009, 8.

[25] Lynne Bowker and César Villamizar, "Embedding a Records Manager as a Strategy for Helping to Positively Influence an Organization's Records Management Culture," *Records Management Journal* 27, no. 1 (2017): 57–68, doi:10.1108/RMJ-02-2016-0005; Gillian Oliver and Fiorella Foscarini, *Records Management and Information Culture : Tackling the People Problem* (London: London : Facet Pub., 2014); Liia Lauri, Mati Heidmets, and Sirje Virkus, "The Information Culture of Higher Education Institutions: The Estonian Case," *Information Research* 21, no. 3 (2016), http://www.informationr.net/ir/21-3/paper722.html#.Wc1JUciGPIU; Anneli Sundqvist and Proscovia Svärd, "Information Culture and Records Management: A Suitable Match? Conceptualizations of Information Culture and Their Application on Records Management," *International Journal of Information Management* 36, no. 1 (2016): 9–15, doi:10.1016/j.ijinfomgt.2015.08.004; Gillian Oliver, "Information Culture: Exploration of Differing Values and Attitudes to Information in Organisations," *Journal of Documentation* 64, no. 3 (2008): 363–85, doi:10.1108/09565691311325004; Gillian Oliver, *Organisational Culture for Information Managers* (Oxford: Oxford : Chandos Pub., 2011).

[26] Elizabeth Shepherd, Alice Stevenson, and Andrew Flinn, "Records Management in English Local Government: The Effect of Freedom of Information," *Records Management Journal* 21, no. 2 (2011): 122–34, https://doi.org/10.1108/09565691111152053; Diane Bedford and Jeff Morelli, "Introducing Information Management into the Workplace: A Case Study in the Implementation of Business Classification File Plans from the Sector Skills Development Agency," *Records Management Journal* 16, no. 3 (2006): 169–75, https://doi.org/10.1108/09565690610713228; Keith Gregory, "Implementing an Electronic Records

There was a marked increase in research on records management in Higher Education in the UK around the introduction of access legislation in the early 2000s. The impact of Data Protection (DP) was less evident in the available literature than Freedom of Information (FoI). During the time between the passing of the Freedom of Information Act and its implementation, a wave of funded projects based on practical experience produced guidelines and tools to implement records management within a HE organisation.[27] Procter's article is written in the midst of this period of optimism stating that "records, their effective management and exploitation, and the legislative framework being constructed around them, are heightening awareness of the importance of such good practice as never before. Within such an environment there can only be positive results".[28] McLeod and Edward's article on FoI in further education colleges sets up Freedom of Information legislation as a driving force behind much of the work done subsequently in the sector. Considering the impact GDPR was expected to have on organisations across the board, it is interesting that there has been a lack of literature on the possible impact of records professionals. It may be too soon to tell but there is also a lack of literature available around the Data Protection Act, 2018, despite reference to its high-profile nature.[29]

Most of the literature from the UK points to a specific organisational culture found in Higher Education institutions. Bott and Edwards state that no university's experience can be generalised to the whole sector.[30] The organisational culture highlighted by Bott and Edwards centres around a separation of the administrative

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Management System: A Public Sector Case Study," *Records Management Journal* 15, no. 2 (2005): 80–85, https://doi.org/10.1108/09565690510614229//.

[27] Jisc, "Revision of the Study of the Records Lifecycle," accessed August 26, 2018, http://webarchive.nationalarchives.gov.uk/20140702153427/http://www.jisc.ac.uk/whatwedo/programmes/preservation/lifecyclerevision.aspx.

[28] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 54.

[29] Sheila Edward and Julie Mcleod, "Is the Freedom of Information Act Driving Records Management in Further Education Colleges?," *Records Management Journal* 14, no. 1 (2004): 40–50.

[30] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 1.

and teaching functions. They state that "any attempt to dictate records management to teaching Departments might well be resented in the interests of 'academic freedom'".[31] This divide coupled with a democratic political structure formed around committees and working groups results in records being dispersed and decentralised.[32] This culture is reiterated by Procter and again by McLeod and Lappin who state "HEIs tend to be more federal in nature, with faculties expecting some degree of flexibility and independence".[33]

Procter was writing around the time of great legislative change during a period of professionalisation of records management and its acceptance as an academic discipline.[34] It was first included within the Higher Education Funding Council Research Assessment Exercise (RAE) in 2001.[35] The publishing of the ISO 15489 standard along with the recent recognition of RM as an academic discipline brought the work and importance of records management to the fore.[36] The consideration of records management as its own discipline is a marked change from the time of Bott and Edwards who claim that 'it is important that no one should suppose that he or she is unqualified for records management by some presumed lack of "training".[37] Bott and Edwards were operating during a time where "almost twice as many trained librarians as trained archivists serve as custodians of records," something which the

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[31] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 10.

[32] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 9.

[33] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 53; Lappin and Mcleod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions Final Report," 3.

[34] Elizabeth Shepherd, *Archives and Archivists in 20th Century England* (Farnham: Farnham : Ashgate, 2009), 200-210.

[35] Caroline Williams, "The Research Imperative and the Responsible Recordkeeping Professional," *Records Management Journal* 17, no. 3 (2007): 151, https://doi.org/10.1108/09565690710833053; Judith Elkin, "Assessing Research in the United Kingdom: The Research Assessment Exercise 2001," *Records Management Journal* 9, no. 3 (1999): 209, http://dx.doi.org/10.1108/EUM0000000007251%5Cr.

[36] Margaret Procter, "On the Crest of a Wave or Swimming Against the Tide? Professional Education in an Information-Conscious Society," *Journal of the Society of Archivists* 26, no. 1 (2007): 55–73, doi:10.1080/00039810500047433org/10.1080/00039810500047433.

[37] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 7.

professionalisation of records management has gone some way to change in the last two and a half decades.[38]

Despite its age, Procter's article could be considered the most holistic work in this sector since Bott and Edwards and in the time since it was written. Since Procter's article, the proliferation of records management work as a result of Jisc, the NFF, the Freedom of Information white paper published by the HMSO and Section 46, laid the groundwork for records management in the HE sector.[39] Procter 2002 article 'One size does not fit all' charts the development of the guidance.[40] However, there has been a lack of review work done. Procter is inherently optimistic in her hopes for the potential new directions and opportunities afforded by access legislation and the new compliance landscape, particularly around the recognition and promotion of the work of records professionals.[41] Procter herself was well placed having been part of the working group on the Jisc 'Study of the Records Lifecycle' project and seizes the opportunity through this article to promote both the role of the records manager and the guidance put forward as a result of the above project whilst also advocating for the recognition and promotion of the work of records professionals. Procter's practical involvement coupled with her professional role as lecturer at Liverpool University within Liverpool University Centre for Archive Studies. Procter's professional role at Liverpool University and her involvement with Jisc and the Public Records Office, now The National Archives, work on model action plans including one for the HE sector. This bridging of theory and practice is interesting

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[38] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 7.

[39] Jisc, "Revision of the Study of the Records Lifecycle"; Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education"; HMSO, "Your Right to Know: The Government's Proposals for a Freedom of Information Act," 1997; Lord Chancellor, "Lord Chancellor's Code of Practice on the Management of Records Issued under Section 46 of the Freedom of Information Act 2000," 2009, http://www.nationalarchives.gov.uk/documents/information-management/foi-section-46-code-of-practice.pdf.

[40] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education."

[41] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 53-54.

when considering most journal and publication contributors often have a practical focus to their work. No reference is made to the international standard being developed at the same time that Procter was writing, but this could suggest the inherently practical needs of those who found themselves responsible for records management.

For Bott and Edwards professional training is not deemed essential to be able to carry out the duties of a records management function. It is acknowledged that a dedicated records manager is not always possible and not always advisable in a university context and that day-to-day management of records should be conducted by the institutions staff or by an administrator or clerk.[42] The responsibility for carrying out records management has not altered much since the 1970s with the strategic responsibility falling to a higher member of staff and the day-to-day activities devolved to the individual departments and staff, something which Procter highlights in her own article.[43]

Part of the formalisation of the role of a records manager ran parallel to the development of an open data agenda in the UK.[44] Screene highlights the development by The National Archives in the UK of a legislated Code of Practice for records managers in response to FoI which was never passed.[45] The Data Protection Act in 1998 and the Freedom of Information Act in 2000 became hooks from which to hang much of the practical guidance which developed out of the sector specific body, Jisc, over the turn of the 21st century. Section 46 of the Lord Chancellor's Code of Practice on the management of records is often cited in

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[42] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 14-16.
[43] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 53.
[44] Julie McLeod, "Thoughts on the Opportunities for Records Professionals of the Open Access, Open Data Agenda," *Records Management Journal* 22, no. 2 (2012): 92–97, https://doi.org/10.1108/09565691211268711.
[45] Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?" 42.

guidance as a driver behind records management for the public bodies to which it applies.[46] Section 46 states that "Freedom of information legislation is only as good as the quality of the records and other information to which it provides access".[47] The Study of the Records Lifecycle and the Model Action Plans devised from this project still form the basis for the available practical guidance, including the Jisc records retention schedule and business classification scheme created for the sector by Emmerson Consulting.[48]

The inclusion of a university in Lorraine Screene's article on the preparedness of public bodies for FoI's implementation is interesting and highlights the lack of leadership support found in the University case study, where FoI was simply added onto the role of another member of staff.[49] The article highlights the key areas around the implementation of FoI which could affect the ability of public sector organisations to fulfil their obligations. These areas include leadership, training, records management, the importance of customer rights, and the systems and procedures in place.[50] One of the most interesting points made by Screene is around the promotion of the retention and disposal seen as central to the policy statement but which exists without the infrastructure to enforce it. The idea of having available guidance without the means to implement it is a shared concern which

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[46] Jisc infoNet, "Higher Education Business Classification Scheme and Records Retention Schedules," 2012, http://bcs.jiscinfonet.ac.uk/he/default.asp; Jisc infoNet, "Guidance Notes for the Records Management Maturity Model," 2009, www.jiscinfonet.ac.uk/records-management/measuring-impact/maturity-model; Jisc, "Revision of the Study of the Records Lifecycle"; Patricia Methven, "Study of Records Lifecycle Foreword 2" (Jisc, 2002), https://www.webarchive.org.uk/wayback/archive/20130607124124/http://www.jisc.ac.uk/publications/generalpublications/2002/recordssrlstructure/fwd2kingscoll.aspx.
[47] Lord Chancellor, "Lord Chancellor's Code of Practice on the Management of Records Issued under Section 46 of the Freedom of Information Act 2000," 4.
[48] Jisc infoNet, "Higher Education Business Classification Scheme and Records Retention Schedules."
[49] Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?" 34.
[50] Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?"

emerged from the study conducted in further education by Edward and McLeod.[51]

The potentially cumbersome nature of the Jisc retention schedule and the difficulties

outlined by McLeod and Lappin around file classification suggest an awful lot of input

in devising appropriately customised versions of these documents with no guarantee

that the resource will be available to see them implemented.[52]

The article concludes that the minimum had been done to enable

organisations to carry out a basic FoI function.[53] It is reasonable to argue that

although FoI has done much to raise the profile of both the records management

function and the role of the records managers within it, as Screene highlights without

additional resource and senior management buy-in records management, those

responsible for it can only do the bare minimum.[54]

The study conducted by Shepherd and Ennion in 2007 used Screene's study

as a foundation to review the impact of FoI and reinforced some of the same

concerns around the readiness of public sector bodies to comply with the

legislation.[55] The research by Shepherd and Ennion found that, whilst organisations

coped with the requests they had received under FoI, had the numbers been higher

the basic procedures and systems put in place would not have managed.[56] The

study also highlights that after the flurry of activity in preparation for the act, once

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[51] Sheila Edward and Julie McLeod, "Is the Freedom of Information Act Driving Records Management in Further Education Colleges?," *Records Management Journal* 14, no. 1 (April 2004): 40–50, doi:10.1108/09565690410528938.

[52] Lappin and McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions"; "JISC InfoNet - Higher Education Business Classification Scheme and Records Retention Schedules," accessed September 13, 2017, http://bcs.jiscinfonet.ac.uk/he/default.asp.

[53] Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?" 40-42.

[54] Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?" 41-42.

[55] Elizabeth Shepherd and Elizabeth Ennion, "How Has the Implementation of the UK Freedom of Information Act 2000 Affected Archives and Records Management Services?," *Records Management Journal* 17, no. 1 (2007): 32–51, doi:10.1108/09565690710730688.

[56] Shepherd and Ennion, "How Has the Implementation of the UK Freedom of Information Act 2000 Affected Archives and Records Management Services?," 2007, 39.

organisations realised they could cope with a basic system, training, guidance, policies and procedures fell by the wayside.[57] Similarly, as with electronic records and FoI, McLeod and Lappin highlight how pressure to implement EDRMS was decreased when organisations realised they could cope without one.[58] The short-term investment may not lead to long term sustainability. In 2007 the optimism felt and expressed by Margaret Procter had still not been realised. Screene hangs hope on the possible implementation of legislation put forward by The National Archives, which would have expanded information rights beyond FoI and which today has not been passed.[59]

In his 2011 article, Bailey highlights the return on investment records management brings, stating that his study is the only one accessible that provides the empirical evidence presented.[60] Storage concerns are not new and continue to be a key driver. Bailey's article focuses on the tangible and fiscal returns on investment good records management can deliver, although he agrees that measuring the benefits of records management is problematic.[61] Similar practical articles have been written in the wider RM sphere on the practical benefits of toolkits by McLeod, Childs and Heaford.[62]

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[57] Shepherd and Ennion, "How Has the Implementation of the UK Freedom of Information Act 2000 Affected Archives and Records Management Services?," 2007, 44.

[58] James Lappin and Julie McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review," *Eduserv*, 2009, 8, www.northumbria.ac.uk/sharepoint_study.

[59] The page has been archived on TNA's website - The National Archives, "Proposed National Records and Archives Legislation: Proposals to Change the Current Legislative Provision for Records Management and Archives," 2003, www.nationalarchives.gov.uk; Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?" 42.

[60] Steve Bailey, "Measuring the Impact of Records Management: Data and Discussion from the UK Higher Education Sector," *Records Management Journal* 21, no. 1 (2011): 46, doi:10.1108/09565691111125107.

[61] Steve Bailey, "Measuring the Impact of Records Management: Data and Discussion from the UK Higher Education Sector," *Records Management Journal* 21, no. 1 (2011): 67, doi: 10.1108/09565691111125107.

[62] Julie McLeod, Sue Childs, and Susan Heaford, "Records Management Capacity and Compliance Toolkits: A Critical Assessment," *Records Management Journal* 17, no. 1 (2007): 216–32, doi:10.1108/09565690710833116.

Outside of the UK and the US there have been more recent developments in research and writing on the topic of records management and information management (RIM) in HE institutions, from Estonia, to Malaysia, Zimbabwe, Nigeria, Turkey, Australia and Canada.[63] There is scope for further research into the reasons behind why the above countries are considering the topic of records in universities when this work has not been covered in depth in the UK. Indeed, there may be parallels in terms of the research being undertaken in the context of similar developments within the UK e.g. developments in open data or in the wake of new information legislation.[64] In a few cases the discussion within the articles revolves around the use of systems, particularly in relation to digital and e-records. In others it is around the intersectionality of records, knowledge, information and data management where processes which may traditionally have been deemed records management are found instead within the remits of information or knowledge management.

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[63] Mary Jane Magno-Tan et al., "Cloud-Based College Management Information System for Universities," *International Journal of Information and Education Technology* 4, no. 6 (2014): 508–12; Raja Ahmed Jamil and Muhammad Saeed Lodhi, "Role of Knowledge Management Practices for Escalating Universities' Performance in Pakistan," *Management Science Letters* 5 (2015): 945–60, doi:10.5267/j.msl.2015.8.002; Fiebelkorn, "Why Does It Take So Long? Implementing Electronic Records Programs at Universities"; Asogwa Brendan, "The Readiness of Universities in Managing Electronic Records: A Study of Three Federal Universities in Nigeria"; Miah and Samsudin, "EDRMS for Academic Records Management: A Design Study in a Malaysian University"; Özgür Külcü, "Quality Documentation and Records Management: A Survey of Turkish Universities," *Aslib Proceedings* 61, no. 5 (2009): 459–73, https://doi.org/10.1108/00012530910989616; Bola C Atulomah, "Perceived Records Management Practice and Decision Making Among University Administrators in Nigeria," *Library Philosophy and Practice*, 2011; Basil Iwhiwhu, "Management of Records in Nigerian Universities: Problems and Prospects"; Delight T Sigauke, Cathrine T Nengomasha, and Samuel Chabikwa, "Management of Email as Electronic Records in State Universities in Zimbabwe: Findings and Implications for the National Archives of Zimbabwe," *ESARBICA Journal - Journal of the Eastern and Souther Africa Regional Branch of the International Council on Archives* 35 (2016): 14–29, https://search-proquest-com.libproxy.ucl.ac.uk/docview/1878316051?rfr_id=info%3Axri%2Fsid%3Aprimo; Sunday O Popoola, "Organizational Commitment of Records Management Personnel in Nigerian Private Universities," *Records Management Journal* 19, no. 3 (2009): 204–17, http://www.emeraldinsight.com.libproxy.ucl.ac.uk/doi/pdfplus/10.1108/09565690910999193; Mpho Ngoepe, "Records Management Models in the Public Sector in South Africa," *Information Development* 32, no. 3 (2016): 338–53, doi:10.1177/0266666914550492; Nathan Mnjama, "Managing University Records," *ESARBICA Journal - Journal of the Eastern and Souther Africa Regional Branch of the International Council on Archives*, n.d., 32–41.

[64] For example, the Freedom of Information Act became law in Nigeria in 2011.

Ceri Lumley

Jisc and the practical tools

     In many ways Jisc is inseparable from the access legislation which gave rise to much of the guidance in the early 2000s. Shepherd, Screene, Procter and Edward and McLeod all mention the Study of the Records Lifecycle or reference the Model Action Plans.[65] Much of the literature on this subject focuses on the practical applications of tools and techniques and is written by academics and practitioners, such as Procter, as a result of projects run by Jisc. The suite of guides which accompany the Jisc infoNet retention schedule and business classification scheme for the HE/FE sector is evidence of the practical nature of the literature available for this sector.[66] The two largest guides are for student records and research records emphasising the focus of HE on these two areas. The importance of student records, highlighted as 'vital records' in the Jisc guidance, has implications in terms of access legislation, predominantly in terms of data protection.[67] As identified in some of the literature available on digital recordkeeping in other public sector organisations, records containing predominantly personal records, such as human resources, are often well managed through distinct systems which are operated by the department which need to manage them.[68] In the case of a university student records are key evidence of the activities of one of the University's main stakeholder groups and arguably the largest group with which it has a contract. The access legislation free landscape of Bott and Edwards in their destruction schedule is somewhat echoed in the footnotes of Jisc's student record guide with a mention of permanent retention in

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[65] Shepherd and Ennion, "How Has the Implementation of the UK Freedom of Information Act 2000 Affected Archives and Records Management Services?," 2007, 38; Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?" 35; Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education" 51; Sheila Edward and Julie McLeod, "Is the Freedom of Information Act Driving Records Management in Further Education Colleges?," *Records Management Journal* 14, no. 1 (April 2004): 41, doi:10.1108/09565690410528938.
[66] Jisc infoNet, "Higher Education Business Classification Scheme and Records Retention Schedules."
[67] Jisc, Managing student records
[68]

the case of the records of an important or interesting student.[69] This view situates

University History as being of historical interest beyond simply the corporate memory

of the institution, something which is alluded to in Bott and Edwards. However, this

guidance would need to be considered in light of the new GDPR and DPA in relation

to the right to erasure and to the increased need to make data subjects aware of why

and how their data is being used and for how long.[70] Permanent retention will no

longer be a realistic possibility for student records in this way.

The main aim of the above guidance notes is to provide a framework within

which organisations can apply the appropriate level of records management for their

situation. The guides are written to be understood at a general level and they lack a

depth which a professional may bring to the role. Edward and McLeod in their article

examining the readiness of further education colleges for FoI may shed light on why

this is. Their article shows a lack of a willingness to employ recordkeeping

professionals echoing statements made by Bott and Edwards such as "only a

minority of Universities feel justified in employing archivists".[71] The Jisc infoNet

guides provide a basic level of guidance to enable records to be kept in line with

minimum requirements and in the absence of a professional. Interestingly,

participants in Edward and McLeod's study identified that records which were

needed to fulfil audit requirements and to support funding were believed to be well

managed.[72] It might therefore be true that despite siloed working, common in HE,

records are being managed well but simply that there is no overarching structure to

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[69] Jisc, Managing student records

[70] "Guide to the General Data Protection Regulation (GDPR)," accessed April 6, 2018, https://ico.org.uk/media/for-organisations/guide-to-the-general-data-protection-regulation-gdpr-1-0.pdf.

[71] Edward and McLeod, "Is the Freedom of Information Act Driving Records Management in Further Education Colleges?" 48; Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*, 7.

[72] Edward and McLeod, "Is the Freedom of Information Act Driving Records Management in Further Education Colleges?" 43.

the records management function. Procter cites the role of the professional in

bringing this umbrella function to fruition.[73]

Jisc is not without its own restrictions and limitations. The impact of funded

projects and not on long term sustainability could be blamed for the stagnation in

new literature being written on this subject over the last fifteen years. The availability

of funding for certain projects could lead to a skewed approach to managing our

institutional records and may result in day-to-day recordkeeping activities being

passed over for new development. Having said this, new developments do not seem

to have been covered in the area of records management either beyond the review

of their existing literature in 2012.[74] Records management cannot always expect to

be a priority, but the rise and fall in activity around investigating issues in this sector,

such as Freedom of Information, may not help the cause of records managers

advocating for the implementation and development of RM maintaining functions in

their everyday work. Much of the Jisc work outlined by Procter is now only available

through the UK Web Archive as the projects have now concluded. This includes the

only easily accessible document which are available are the central records

management guide, the retention schedule and business classification scheme and

the accompanying guidance mentioned above. Where the results of projects have

been written up into journal articles these literature sources are easier to retrieve but

there is a general unavailability of much of the preparatory work discussed by

Procter, particularly around the records lifecycle.

There is no denying the importance of Jisc in the education sector. However, the

lack of a recent review of the guidance is concerning when considering the dramatic

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[73] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 53.
[74] Jisc, "Records Management," 2012, https://www.jisc.ac.uk/full-guide/records-management.

changes which have occurred in electronic records management (ERM). It is difficult to believe that this guidance does not merit regular review as is stated is necessary in the 'Revision of the Records Lifecycle' study.[75] The blanket approach to both paper and electronic records in the guide does not address the needs and nuances of these different record types. Nor does it provide the means for practical workflows and tools which need to be put in place to manage them.

Digital recordkeeping in Higher Education institutions

The divergence of HE from other public-sector organisations can be most clearly seen in the development of digital records management. The e-government drives identified by Bell in her review of EDRMS resources in the UK and Europe in 2005 do not extend to the Higher Education sector.[76] Bell discusses "initiatives in e-government which are relevant to those implementing EDRM in central or local government and public bodies" without considering those public bodies not subject to the same initiatives.[77] Digital initiatives, highlighted in the *Modernizing Government* white paper and implemented by many local government and health departments, were mandatory in the face of increased calls for accountability.[78] Although accountability in Higher Education was increased, the move to digital recordkeeping and the reliance on digital systems was not wholly shared across the public sector.

Key developments in digital records are not discussed in Procter's work. The digital landscape in 2002 was much different than in 2018. In this area Jisc have funded research into the changing digital landscape with projects at the University of

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[75] Jisc, "Revision of the Study of the Records Lifecycle."

[76] Helen Bell, "A Review of EDRMS Resources in the UK and Europe," *Records Management Journal* 15, no. 3 (2005): 169, doi:10.1108/rmj.2005.28115cae.002.

[77] Bell, "A Review of EDRMS Resources in the UK and Europe," 169.

[78] Gregory, "Implementing an Electronic Records Management System: A Public Sector Case Study," 81.

Glasgow such as espida.[79] The rise and fall and perpetuation of Electronic Digital

Records Management Systems (EDRMS) is a key characteristic, as are

developments in related fields such as information, data and knowledge

management.[80] Procter identifies individual freedom as characteristic of the HE

sector.[81] Academic freedom afforded to members of staff within the organisation will

only grow with the developments in technology and the adoption of more agile ways

of working. 'Bring Your Own Device' policies such as those adopted by the University

of Reading, the University of Edinburgh and others. These policies are examples of

such encouraged autonomy which record keepers within these organisations will

have to adapt to ensure records are captured.[82] The benefits highlighted by more

mobile and agile patterns of work should be balanced by the need to understand

what information is held by an organisation and where to fulfil legislative

requirements around disclosure, retention and disposal.

The debate around records management and email has only grown in recent

years. Email is considered one of the key problems facing records management in

the digital world. Work has been conducted more widely in this area by the Digital

Preservation Coalition, and many opinions have been voiced with suggestions for

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[79] espida Team, "Final Report for the Project Effective Strategic Model for the Preservation and Disposal of Institutional Digital Assets (Espida)," 2007, http://webarchive.nationalarchives.gov.uk/20140702145031/http://www.jisc.ac.uk/whatwedo/programmes/preservation/assetmanagement/espida.aspx.

[80] Stephen Harries, *Reframing Records Management: Towards Knowledge Governance*, *Records Management and Knowledge Mobilisation*, 2012, doi:10.1016/B978-1-84334-653-1.50011-1; Kenneth Tombs, "Knowledge Management Is Dead: Long Live Records Management," *Records Management Journal* 14, no. 2 (2004): 90–93, doi:10.1108/09565690410546145; Bedford and Morelli, "Introducing Information Management into the Workplace: A Case Study in the Implementation of Business Classification File Plans from the Sector Skills Development Agency"; Gary P Johnston and David V Bowen, "The Benefits of Electronic Records Management Systems: A General Review of Published and Some Unpublished Cases," *Records Management Journal* 15, no. 3 (2005): 131–40, doi:10.1108/09565690510632319; Paul Sutcliffe, "Building the Corporate Memory in the E-Environment," *Records Management Journal* 13, no. 2 (2003): 51–53, doi:10.1108/09565690310485261.

[81] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education."

[82] University of Reading, "Bring Your Own Device," 2017, https://www.reading.ac.uk/web/files/imps/Bring_Your_Own_Device_Policy_V.1.0_2017_05_08.pdf; University of Edinburgh, "BYOD Policy: Use of Personally Owned Devices for University Work," 2015, https://www.ed.ac.uk/files/imports/fileManager/BYODPolicy.pdf.

tackling the issue including by James Lappin.[83] The HE sector is no different in its need to manage the mountainous issue of email records which as Lappin points out contain important business decisions.[84]

The 2003 Jisc funded project undertaken at Loughborough University, entitled 'Institutional Records Management and E-mail', which was presented at the EUNIS conference in 2007 highlights issues which are core to the email record debate but which may have wider implications in the realm of digital records management.[85] The project had four aims, to 'examine current working practices, develop policies for the retention and disposal of email, evaluate technical options for archiving email and to inform Loughborough University and UK HE sector of the findings'.[86] The surveys of IT practices in other universities provides a useful foundation for this study, despite the relatively low response rate and the difference in institutions who replied with each review.[87] Perhaps a sense of ownership cited by Booth et al is more unsurprising within a HE context.[88] Within a sprawling HE structure staff interact with information systems in a much more personal manner.[89] The study highlighted that "users see e-mail in particular as an informal method of correspondence, and their own personal property".[90] Overcoming this sense of ownership is one of the main hurdles for those operating in such devolved organisations as universities. The knowledge of FoI was far less in this study than DP.[91] The relatability of DP

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[83] Christopher J. Prom, "Preserving Email," *Technology Watch Reports*, no. December (2011): 57, doi:http://dx.doi.org/10.7207/twr11-01; Digital Preservation Coalition, "Email Preservation: How Hard Can It Be?," 2017, http://www.dpconline.org/events/past-events/email-preservation-2017; James Lappin, "Solutions to the Email Problem," *Thinking Records – James Lappin's Records Management Blog*, 2017, https://thinkingrecords.co.uk/.

[84] Lappin, "Solutions to the Email Problem."

[85] Garry Booth, Graeme Fowler, and Carys Thomas, "E-Mail Archiving for Records Management," in *EUNIS 2007*, 2007, https://dspace.lboro.ac.uk/dspace-jspui/bitstream/2134/3091/1/eunis2007-110.pdf.

[86] Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management," 1.

[87] Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management."

[88] Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management," 2, 4.

[89] Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management," 4.

[90] Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management," 2.

[91] Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management," 2.

legislation may be the reason why, in HE, staff are more confident in their application of the Data Protection Act. Although there are varying levels of what people may consider to be acceptable to be known about them, the data and information itself is more obvious in nature.

What is promising in the conference paper of Booth et al, is that a practical solution was found, and was based on traditional methodologies such as DIRKS using fileplans.[92] The ability of the project to take into account the individuality staff felt they possessed within their work is encouraging, whilst also providing a new system for managing an ever-increasing volume of email records.[93] The conclusion of the study claims that the "new storage implementation has to date been received reasonably well" and that staff are "engaging well with setting up the fileplans" which were done by the departments themselves.[94] Considering the difficulties highlighted by McLeod and Lappin around the implementation of fileplans, this last point is promisingly optimistic, although the seeming lack of a review or follow-up study means the success and continuation of the project work is difficult to measure.[95]

Much has been made of email as a separate concern within the digital landscape, however, the difficulties in management, appraisal and destruction of digital records should not be considered as a separate issue but requires integration around wider digital recordkeeping strategies and solutions. From 2006 the rise in literature around the development of Electronic Document Records Management Systems was evident when carrying out the database searches. In the HE sector

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[92] NSW State Archives and Records, "DIRKS Methodology and Manual," accessed August 5, 2018, https://www.records.nsw.gov.au/recordkeeping/advice/dirks/methodology; Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management," 9.

[93] Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management," 9-10.

[94] Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management," 10.

[95] Lappin and McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review."

SharePoint would appear to have taken a large part of the market for fulfilling some of the functionality of an EDRM.[96] In their literature review McLeod and Lappin highlight how "No published examples have been identified of HEIs that have attempted to implement the full EDRM model, with a corporate business classification (based on JISC business classification scheme) and a roll out to all staff."[97] McLeod and Lappin's literature is more general in its scope and goes beyond the use of SharePoint as filling an EDRM gap.[98] The review analyses its use in six main areas; as a teaching and learning tool (VLE), as a research collaboration tool, as a portal to a student administration service, for "social computing" for its wiki and blog functions, as a workflow management tool and to monitor business performance over multiple platforms.[99] McLeod and Lappin make the case for EDRM failing completely in HEIs which again differs them from other public-sector institutions and especially in government settings.[100]

The above project was funded by Eduserv to investigate the use of SharePoint which in their words has "spread rapidly in the Higher Education (HE) sector".[101] Although this project was not strictly about records management, the study makes some interesting points regarding the use of such platforms and systems as SharePoint. In fact, there has been strong scepticism around their use voiced by prominent practitioners within the sector, most notably Steve Bailey, whose address

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[96] Lappin and Mcleod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions Final Report," 2-3.

[97] Lappin and McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review," 9.

[98] Lappin and Mcleod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions Final Report," i.

[99] Lappin and McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review," 9-25.

[100] Lappin and McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review," 8.

[101] Lappin and McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review," i.

to the Records Management Society Conference in 2008 is paraphrased in this article with Bailey claiming that EDRM is a "damned expensive sledgehammer to crack the nut that is the largely ephemeral contents of most network drives".[102]

It seems the organisational culture of HEIs is often at odds with the corporate structure. McLeod and Lappin identify the "decentralized organisational culture with faculties, schools and departments tending to be suspicious of strong central corporate control".[103] The failure of EDRM to gain a grip in the HE sector, despite initial support from Jisc between 2002 and 2004, may stem from a feeling that "rigid corporate fileplans were culturally alien" to HEIs.[104] If these statements are still believed to be true of the Higher Education sector then it continues to face an uphill struggle to impose centralised control.

The role of the records manager in Higher Education

Procter highlights the Freedom of Information Act and its introduction as the turning point for the involvement of a records professional in the records management function within universities.[105] Although this may not have been the case in further education colleges, the institutions highlighted by Procter as seeking a records manager in 2002 now have a professional in place as discovered through the preliminary desk-based research conducted for this study.[106] Since Procter, the

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[102] Bailey's address is now no longer available but was previously found here http://rmfuturewatch.blogspot.com/2008/04/edrms-case-against.html; Lappin and McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review," 8.
[103] Lappin and McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review," 8.
[104] Lappin and McLeod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions: Literature Review," 8.
[105] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 48.
[106] Edward and McLeod, "Is the Freedom of Information Act Driving Records Management in Further Education Colleges?"; Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 53; for example, a records manager is identified in LSE and Brunel University's RM policies here https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/recManPol.pdf and http://www.brunel.ac.uk/about/documents/pdf/records-management-policy.pdf

ISO 15489 standard has been introduced and reviewed and records management education has been cemented within the courses offering the accredited recordkeeping qualification.

It is the external environment which is driving change and the visibility of RM programmes is increased in those cases where RIM practitioners can adapt to these changes. However, it is concerning if institutions are fulfilling records management through compliance rather than compliance being fed by good records management. The impact of the GDPR may well be seen more prominently in the changing role of the records manager than in the generation of literature. The fact that many records manager roles may grow to encompass and absorb information compliance more generally should ensure both the continuing importance and relevance of records management and records managers in HEIs.[107]

McLeod's article 'On being part of the solution' presents an approach which might suit the organisational culture which is suggested as having a negative effect on the ability to impose central control over records in HEIs. The opportunity for all within an organisation everyone to become a "records manager (with a lower case "r" and "m")" leaves the records manager role to take on the strategic role as Procter, and to some extent Bott and Edwards, hoped it would become.[108] After all, in light of digital developments, total control of records, information, and now data, may not be possible in UK universities. The key difference between the approach outlined by

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[107] Institutions' websites gives some indication of where RM sits within the organisation for example, KCL's records management function appears to sit in Governance and Legal Services (https://www.kcl.ac.uk/governancezone/InformationPolicies/Records-and-Information-Management-Policy.aspx) and Cardiff University's in Governance and Compliance (http://www.cardiff.ac.uk/__data/assets/pdf_file/0006/382551/RecordsManagementPolicyV2_0Final.pdf).

[108] Julie Mcleod, "On Being Part of the Solution, Not the Problem," *Records Management Journal* 22, no. 3 (2012): 191, doi:10.1108/09565691211283147; Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 53; Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions,* 14.

McLeod and the reality of universities in the 1978 study is the employment of a qualified records manager with formal training, and the value attributed to records management education and qualifications more generally. Where theory meets practice it may be more useful for the tools to be considered loose guidance. Treading a fine line between professional conduct in carrying out our duties in line with all standards and best practice and ensuring that our approach is proportional and works for the organisation. Some may choose to take a risk-based approach, knowing which battles to fight and which to monitor. This approach can only work with a professional in charge with an intrinsic appreciation for all aspects of recordkeeping and with a solid theoretical foundation.

Records management in UK universities requires another holistic study. If the literature and the shift in the role of the records manager continues in the way it seems to be, the positive implications of further access legislation will be felt across the sector. The GDPR is understandably the biggest milestone the UK has encountered in the realm of data privacy in the last two decades and therefore provides a reasonable bookend for this study. There has been remarkably little literature or practical guidance, produced outside of the ICO, around how the changes should be managed in the records and information sector. This study will incorporate investigation into attitudes towards the new legislation to assess whether information legislation remains a key driver for RM. The available literature since the optimism of Procter in 2002 presents a mixed picture of the progress of records management within HE. It is hoped that this study may provide an updated holistic overview of the main challenges and opportunities in this area today.

Chapter 3 – Findings

The participants reflected on the overall responsibility for records management within their organisations. Three out of the four participants had responsibility for overseeing records management as well as other responsibilities around information compliance, such as freedom of information and data protection.[109] Two out of the three institutions had a dedicated records manager in post and the remaining two participants had records management as an explicit responsibility within their job description. The importance of having a dedicated resource was highlighted by P2 and P3.[110] The role of records manager was identified by P1 and P2 as being one of taking responsibility for final decisions, including around risk. P1 identified retention as a risk-based activity and stated that the role would be moving more towards the area of risk in the future. This is reflected in the job title of the Risk and Compliance Manager (P3) who's role included records management. P3 highlighted the benefits of having a trained professional in post stating "I've got a Master's degree in Archives and Records Management…so I know what I'm doing, I've had proper training, so I know all the theory behind what it is that I'm recommending to people."[111] P3 continued highlighting the need for employing the correct professional to the appropriate role within the organisation including voicing concern over employing an IT professional to the role of Chief Information Officer when technology, not information, is their focus.[112]

Explicit responsibility was identified as aiding records management across the organisation in all four institutions, whether this was through a dedicated member of staff or a network of information contacts. The allocation of roles was also an important factor in all four institutions where the organisation is devolved. P4 stated

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[109] Interview 1: Interview 2; Interview 3.
[110] Interview 2: Interview 3.
[111] Interview 3.
[112] Interview 3.

that "a network of information champions where it [records management] is explicit within their job descriptions…that activity is part of their role…would have the biggest impact."[113] P1 stated that their network of contacts formed a 'triage' and served as the first port of call for records management queries with issues being forwarded to the participant's team for further assistance. The network of staff necessarily had to be interested and willing to undertake devolved responsibilities around records management. P2 identified that without the engagement of these members of staff devolved responsibility did not work.[114] For P2 "when I inherited the list [of contacts] there was a lot of people there who just weren't engaged…they'd been told by their teams to do it and they would never turn up, wouldn't answer emails."[115] The importance of a network of champions was highlighted by P4 as being the one change that would bring the most positive impact to the organisation above all other considerations.

The demarcation of roles was different across the organisations interviewed. Particularly around research data management (RDM). In all four institutions the RDM function was undertaken by another member of staff or department. In I1, I2, and I4 there was a definite link and strong collaboration across the different aspects of the role, including around data protection in I2 and as a direct result of the GDPR in I1 and I4.[116] P2 identified that there were aspects of the RDM function which fell outside of the remit of records management and that the function sat in the wrong place within their organisation.[117] Being in the Library the focus was on the final outputs of the research rather than involvement from the beginning of the process.[118]

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[113] Interview 4.
[114] Interview 2.
[115] Interview 2.
[116] Interview 1: Interview 2: Interview 4.
[117] Interview 2.
[118] Interview 2.

There is a distinct difference between the responsibility for the overarching strategy and guidance and the hands-on practice of managing records. This was clear across all four institutions; the exception was in the management of records housed in an off-site storage facility in I2 and I4.[119] All four participants were guiding rather than doing when it came to records management, although P1 discussed the ad hoc in person sessions with those areas or departments with large amounts of material which would be worked through with the participant.[120] The responsibility for the management of current records was down to individual teams and members of staff within the universities. All four participants highlighted that despite devolved responsibility, professional services such as finance and HR could be relied upon to adequately carry out records management owing to their own knowledge and awareness of their compliance framework.

More general awareness of RM was felt differently across the four institutions and between high-level and general staff. Awareness and engagement was intrinsically linked to the perceived value of records. Questions about guidance and available tools asked by staff was a sign of engagement in I4 and could be seen as such in I1 and I2.[121] P3 identified that in their organisation awareness was low amongst general staff, and records management was a tick-box exercise by the organisation at a higher level.[122] A gap was identified in I3 between awareness and resource with recent awareness, piqued by the GDPR, increasing the resource in the appointment of a records professional.

Awareness and engagement was also different across the divide between academic and non-academic staff. Engagement was encouraged through seeking

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[119] Interview 2: Interview 4.

[120] Interview 1.

[121] Interview 4; Interview 1; Interview 2.

[122] Interview 3.

tangible benefits for staff in I1 and by giving the staff the reasons behind why records management is important, particularly around retention, in I2.[123] P1 stated a greater need to incentivise around practical benefits than use other more abstract arguments around compliance and RM theory to promote engagement. P1 explained how "far more putting across that good records management can reap rewards in other ways, more practical ways, that mean something to that department is often more the driver."[124]

There was a shift in assignment of value attributed by P1 in their organisation depending on the level of risk associated with their retention or disposal such as personal data and research data.[125] There were also other areas where records and information were identified as valuable. P3 highlighted the potential use of information and big data to drive strategy, like the use by Tesco of information on their clubcards.[126] They stated that it was "a trick that's been missed" and P4 also discussed the possibilities for records and information around "impact" which they identified as being a key part of their HEI's strategy.[127] P4 also identified the value of records of historical importance and outlined the position of their team as linked to that of the archives as being of an advantage.[128] P4 identified the day-to-day value of records and information in the daily work of staff stating that "generally, people realise they can't do their job without them. Whether they explicitly call them records or whether they just see it as information or data, I think people do regard them as assets for the university".[129] Similarly, P3 stated that it is difficult to describe exactly

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[123] Interview 1; Interview 2.
[124] Interview 1.
[125] Interview 1.
[126] Interview 3.
[127] Interview 3; Interview 4.
[128] Interview 4.
[129] Interview 4.

what a record is in the current recordkeeping environment.[130] There was a difficulty

identified by P4 as to the ability to separate records, information, and data. P4 also

highlighted their importance for reporting requirements of the HE sector to

organisations like the HESA and the Office for Students also identified by P2.[131]

The provision of guidance and training was a large part of the responsibility of

the records management function at each university and was felt to be key to

overcoming the organisational structure. The availability and accessibility of

guidance was discussed by all four institutions. All four participants stated that their

available guidance could be found online and P2 also discussed the location of the

guidance on the institution's intranet. P2 and P4 made the link between transparency

and the public's need to know in terms of the institution's approach to records

management. Guidance was both high-level and practical. All four institutions had a

records management policy in place, although P3 stated that their institution's policy

was more like a retention schedule.[132] The positive impact of Jisc's retention and

business classification scheme was felt across all four organisations. Jisc provided a

baseline for the practical tools and guidance that each institution developed. The

records retention schedule was voiced by all P2, P3, and P4 to be the tool most

adapted for the individual needs.[133] From three out of four participants there were

concerns at the complexity and detail included in the schedule and all four

institutions voiced concern, expectation and suggestion, that a review of the records

retention schedule was badly needed.[134] The reviewing and relevance of guidance

was highlighted by all four participants with I2 and I4 stating that their institutions

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[130] Interview 3.
[131] Interview 4; Interview 2.
[132] Interview 3.
[133] Interview 2: Interview 3; Interview 4.
[134] Interview 1: Interview 3; Interview 4.

periodically review their guidance.[135] P3 stated that when time was more available the task of reviewing and updating the institution's guidance would be a priority.[136] The age of the Jisc schedule was identified as having a negative impact on its relevance with the record types identified within the schedule not being reflected in practice in a modern university setting.[137] There were also concerns raised by P1, and reflected by P2, that universities are operating in a very different context than that of the time when the Jisc retention schedule was produced.[138]

Internal drivers such as space were identified in I1 and I2.[139] The provision of the off-site storage service was discussed by P2 and P4, and although P1 identified space as a driver they did not mention the provision of an off-site storage facility.[140] P3 established that in their organisation, space was not considered a driver.[141] Staff time was the other major resource which was seen to have a negative impact on the records management function. P1, P2 and P3 all stated the need to prioritise tasks with new information compliance law taking up a large amount of the time of the professional in charge of RM.[142] General resourcing and the form of financial support differed across the organisations interviewed. P1 and P4 identified project-based funding for the RM function which has limitations in its short-term nature.[143] Those interviewed, particularly P2, identified opportunities to capitalise on resource from other areas of work with implications for RM, such as the GDPR.[144] All four institutions highlighted inadequate resourcing as a barrier to progressing RM in their

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[135] Interview 2; Interview 4.
[136] Interview 3.
[137] Interview 3.
[138] Interview 1; Interview 2.
[139] Interview 1; Interview 2.
[140] Interview 2; Interview 4.
[141] Interview 3.
[142] Interview 1; Interview 2; Interview 3.
[143] Interview 1; Interview 4.
[144] Interview 2.

organisations. P1 highlighted the inability to undertake auditing activities in their

organisation owing to limited resourcing for records management more generally in

the organisation.[145] External consultants were understood to be too expensive for I1

and I2 outside of project specific work.[146] P3 identified a lack of investment in ERM in

a previous institution despite a business case being written.[147]

The organisational culture in all four institutions was linked to the

organisational structure. Organisational structure was seen to have an impact in the

way staff approached and viewed records management. The organisational culture

in all four organisations was found to be of individual freedom. RM was not stated as

being mandated but rather that guidance was expected to be followed. In I2 RM was

seen by staff as a burden. Duplication and siloed working was also identified in I1

and I3. A resistance to change was identified by P3 as being one of the main barriers

to resourcing and embedding a records and information culture. The divide between

academic and non-academic staff was clear in I1 and in I2 where work was being

done to bring academic staff and professional services closer together.[148] Academic

staff were identified by P2 as having multiple responsibilities between teaching,

research and their own admin.[149] The trust and reliance in staff was paramount in

universities where the organisational structure creates divides. The situation of the

records management function in relation to the corporate archive was important to I2

and I4, and all four participants discussed natural links between the IT functions, as

well as with the wider governance activities.[150] P2 and P4 referenced staff changes

and restructures as presenting problems to the long-term strategy and goals of the

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[145] Interview 1.
[146] Interview 1; Interview 2.
[147] Interview 3.
[148] Interview 1; Interview 2.
[149] Interview 2.
[150] Interview 2; Interview 4.

records management function.[151] A hierarchical structure of governance was found in I2, I3 and I4, with P4 identifying the complex, multi-layered nature of universities.[152] P2 and P4 highlighted the multiple boards and committees which made up their reporting structure.[153] P4 stated that the structure appeared to work for RM in their organisation, however, P3 was less optimistic stating that the situation of their role on a lower level within the organisational structure prevented opportunities to advocate.[154] P2 identified the committee structure as a barrier to achieving results in the instance of the committee being able to come to a decision.[155]

Differences in approaches to digital and paper records were bound up in discussions around the almost unanimous culture of digital working. Digital workflows were fully embraced within the four organisations with only P2 stating that some areas of their institution still work to a 'manual unstructured' process around print-to-paper. Paper processes were found by participants not to be applicable to electronic systems and records. The spread and multiplication of systems across the university was identified by all four participants. The proliferation of systems across the institutions was a consequence of the ubiquity of digital technologies and this was not simply a concern in Higher Education, as highlighted by P1.[156] P1 and P4 highlighted a legacy of systems which the records management function had been tasked to deal with.[157] A multitude of system types was also identified, with the use of department/area specific databases and of course email. All four institutions tackle these system types separately in their application of recordkeeping practices. P4 described their situation with regards to systems as being shared across multiple

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[151] Interview 2; Interview 4.
[152] Interview 2; Interview 3; Interview 4.
[153] Interview 2; Interview 4.
[154] Interview 4: Interview 3.
[155] Interview 2.
[156] Interview 1.
[157] Interview 1; Interview 4.

institutions.[158] There was an understanding of the need for individual systems to complete certain functions but with a level of control of record processes within them. P4 stated that "generally, as an institution, possibly like several others, although I think we possibly took it to a bit of an extreme, we had…what's been termed an 'ecology of systems', so, we had a lot of different systems".[159]

The possibilities around technology and around systems was identified by three out of the four institutions as being the one thing which would have the biggest impact on the records management function. Only P4, who referenced technology when asked question 4.1 (see appendix B), believed addressing their institution's lack of contacts would be more valuable.[160] The importance of data and the opportunities afforded by collaborative systems was voiced by P3 and P4 as being a potential opportunity for HEIs in the areas of impact aligning records management with wider organisational strategy and vision and pushing the institution beyond the more traditional areas of research and teaching, a direction identified by P1. Online tools and tools within available systems were suggested as having potential for a big impact. The use of available systems which were already embedded or used across the institution was favourable by P1, P2 and P4.[161] Making use of already established resource and investment in these systems by the organisation was worthwhile. The limited records management capability within the available systems, particularly SharePoint, was highlighted by P2 and P3.[162] However, both participants and P1 claimed that either the use of SharePoint, or the production of proper training guides to be able to utilise the records management capabilities of these systems by those

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[158] Interview 4.
[159] Interview 4.
[160] Interview 4.
[161] Interview 1; Interview 2; Interview 4.
[162] Interview 2; Interview 3.

with expertise in IT, would bring the most benefit.[163] P2 identified the further system, RecordPoint, as being able to fill the gaps in SharePoint's functionality after stating that their institution only currently used SharePoint as a records management system where appropriate e.g. in the management of certain record types around governance and projects.[164]

Control by records management practitioners over systems was also highlighted as an issue which needed addressing, particularly in their design, implementation and roll-out.[165] P3 highlighted the issues of implementation and roll-out when recalling an attempt to adopt an "enterprise-wide" EDRMS in a role fourteen years prior which ended in withdrawal of resource and the ultimate failure of the system.[166] The involvement of those with records management responsibilities in the entire systems development process was highlighted as being of high importance by P1 and P4, particularly in relation to big systems used specifically in HEIs such as Tribal and Virtual Learning Environments (VLEs).[167] Systems were also identified as being resource intensive and requiring ongoing support to ensure continued use and investment. The expertise required around their initial set up was identified as a barrier by P1 with external consultants being outside the resource the institution could provide.[168] P1 stated that "there are tools out there, to assist with records management but…I don't think that they're widely used, because I think they're…quite difficult to set up, things like SharePoint".[169]

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163 Interview 1.
164 Interview 2.
165 Interview 1.
166 Interview 3.
167 Interview 1; Interview 4.
168 Interview 1.
169 Interview 1.

The impact of compliance and compliance with information access legislation, was one area where participants differed in their approach and attitudes. The GDPR was named by each institution as having either a direct or indirect influence on the records management function. P3 highlighted that without the GDPR their current institution would not have employed a records professional.[170] There was a link between the length of time the institution had dedicated resource to the role and the comprehensive nature of the guidance available. I3 had only employed a dedicated person to manage the records management function from the end of last year. I4 employed its first records manager because of FoI.[171] However, compliance and its ability to drive records management varied across the four institutions. Both P2 and P4 highlighted the 'stick' like nature of GDPR as a means to drive records management on:

> "on the one hand the push, so the stick of GDPR saying 'yeah, you got to do this' and then the carrot of hopefully making things a bit easier for people, improving processes, if we can use…those two approaches, then hopefully we'll get to a point where records management is fully mature." [172]

This statement highlights the individual approaches taken by each organisation, perhaps necessarily to tackle their own organisational culture. There was general disagreement as to the success of compliance as a driver for RM. P4 claimed that "you use what you've got" when raising levels of awareness and engagement within the organisation. P4 also highlighted that there is often a need to use compliance as a negative push, although the success of this approach is counteracted by P1 who claimed that "*compliance* i.e. we need to do it to comply with the law, is never a great driver for many things".[173] P1 stated that compliance with the law was secondary to

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[170] Interview 3.
[171] Interview 4.
[172] Interview 2.
[173] Interview 1.

the more practical and personal concerns of each department.[174] All four institutions highlighted that specific professional services departments responded to their own compliance requirements but that wider staff were more influenced by visible information legislation. The publicity offered by the GDPR for the records management function was realised across all organisations. P4 stated that although staff may not be aware of the detail of the new data privacy legislation they are aware of it's grounding in information and data management and protection.[175] P2 suggested the possibility of gaining extra resource to complete tasks such as process mapping would inform the work of the records manager, providing an overview of the movement of records and information around the organisation.[176]

The Higher Education sector context was discussed by P1, P3 and P4 as being of huge importance to practitioners in HEIs, with all four discussing the shared concerns around records management practice and legislation.[177] Links with other universities existed through working groups (P1), sector meetings (P4), or in sector specific channels of communication like the Jiscmail HE Information Compliance and Records Management mailing list (P3).[178] There were also further links identified by P1 and P4 with P4 identifying the need for awareness of developments around records management within the wider public sector through the Jiscmail Archives and Records Management lists.[179] The changing nature of HE was referenced by P1, P2 and P3 in the increased contractual relationships institutions entered into with retention or recordkeeping considerations within them.[180] P1 stated that records management would be an increased consideration in this context owing to a need to

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[174] Interview 1.

[175] Interview 4.

[176] Interview 2.

[177] Interview 1; Interview 3; Interview 4.

[178] Interview 1; Interview 4; Interview 3.

[179] Interview 1; Interview 4.

[180] Interview 1; Interview 2; Interview 3.

prove the reputational credentials of the institution as a research or business

partner.[181] The financial considerations of research grants and the need to manage

research data and research records was also important in I1.[182] The regulatory

framework in which HE sits was viewed differently across the participants. P2 and P4

differed in their view of how highly regulated the HE sector was.[183] Despite citing

many of the same regulatory bodies including the ICO, HESA and the Office for

Students, P2 believed HE was less formally regulated, relative to other industries

such as the gas or pharmaceuticals industries.[184]

Specific recordkeeping activities were discussed across all four organisations.

Retention and disposal were key concerns particularly in light of the new GDPR. P1

and P3 identified issues which could arise around duplication and retention of

information and data across the organisation's system which could impact on subject

access requests.[185] There was a need for an individual approach to retention in

organisations where research grants required a specific retention period for the data.

The possibility of automation around some recordkeeping practices was suggested

by P1, P2 and P3.[186] Using a functional approach to model the records retention

schedule for the organisation was undertaken in I2 providing a sustainable

foundation in the face of frequent staff changes.[187] P3 voiced possibilities for

implementing big-bucket retention, with P1 supporting alternate methodologies to

counteract resource and confidence issues around granular disposal of records.[188]

P2 stated the need to base recordkeeping activities on the results of data audits and

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[181] Interview 1.
[182] Interview 1.
[183] Interview 2; Interview 4.
[184] Interview 2.
[185] Interview 1; Interview 3.
[186] Interview 1; Interview 2; Interview 3.
[187] Interview 2.
[188] Interview 3; Interview 1.

surveys and the need to make informed decisions across the organisation based on record use and need.[189] P3 stated that once the current resource being dedicated to the GDPR work could be redistributed they would be putting in place key tools, guidance and training in their organisation in line with traditional records management theory lines.[190] P2 and P4 identified the need for holistic, lifecycle management of the records within the organisation, including their long-term preservation in the corporate archive.[191] There was a lack of knowledge of recordkeeping theory identified amongst general staff, particularly by P4, but this was not identified as an issue as the staff were aware of the importance of the records and information they worked with.[192] The need for the records professional in I2, I3 and I4 to understand the theory and implement guidance around it, was an important factor.[193]

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[189] Interview 2.

[190] Interview 3.

[191] Interview 2; Interview 4.

[192] Interview 4.

[193] Interview 2; Interview 3; Interview 4.

Chapter 4 - Discussion

The impact of digital

It is clear from the participants interviewed that in the time since Margaret Procter's 2002 article, the biggest change in the records management landscape in in the development of digital technologies and digital working.[194] As outlined by McLeod, the impact of digital is far reaching in the changes it has made to working behaviours, attitudes to recordkeeping and the systems relied upon by all staff in HEIs to do their jobs.[195] All four participants stated that their organisations could have been doing more to manage electronic records but that they were facing almost insurmountable obstacles in organisational culture and structure, resource and engagement from the wider staff, as well as the exponential increase in the numbers of systems used by the institutions and the amount of digital information created.

The 'one size fits all' approach does not work in HEIs owing to the plethora of systems which require different treatment. Email is a key record type which, as highlighted by Booth, Fowler and Thomas, is one area of electronic records management where the individuality of staff and their sense of ownership becomes a barrier.[196] The limitations of email systems themselves was discussed by P2 who's organisation provides guidance and can *suggest* the use of tagging functions within the Gmail system, but ultimately cannot control email records owing to a lack of functionality within the system itself.[197]

The importance and influence of SharePoint in all four institutions cannot be denied and could represent a move by HEIs to a standardised platform for managing

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[194] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education."
[195] Mcleod, "On Being Part of the Solution, Not the Problem," 187-190.
[196] Booth, Fowler, and Thomas, "E-Mail Archiving for Records Management," 2.
[197] Interview 2.

certain electronic records. Often included in campus agreements, SharePoint provides a cheap, collaborative document management option for HEIs as shown in the study by McLeod and Lappin.[198] The optimism of the first three participants around the uses and maturity of records systems is indicative of the willingness of those with RM responsibilities to utilise and adapt these systems to enable effective RM.[199] P4 identified the complete and comprehensive nature of the paper file registry at their first HEI as a goal in the representative corporate record it provided. The level of control found in the paper registry and in those HEIs who's online guidance suggests an overarching management of paper records through an internal system.[200] P3 suggested a historic lack of action around paper records simply because their organisation had no issues around space.[201]

It is clear RM in HE is moving into a new era. Although the static figures in I4's off-site storage would argue that the volume of paper records created has not gone down, P1 highlighted how paper and hardcopy records were "eventually going to fizzle out, I think, over the next decade".[202] The end of the hybrid era of paper and electronic recordkeeping was also remarked upon by P3 who stated that "perhaps we're approaching the end of that awful grey period where there wasn't any appropriate recordkeeping, but people were still working electronically".[203]

Big data and the reuse of data is not only of importance in the research data function of the HEI.[204] If records managers adapt their roles, expanding suggestions

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[198] Lappin and Mcleod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions Final Report," 4.
[199] Interview 1; Interview 2; Interview 3.
[200] UCL's guidance for paper records suggests a well-oiled internal system centrally controlled and overseen by the records management team.
[201] Interview 3.
[202] Interview 4; Interview 1.
[203] Interview 3.
[204] See McLeod, "Thoughts on the Opportunities for Records Professionals of the Open Access, Open Data Agenda."

put forward by Childs et al in their 2014 study, the use of big data by universities could drive institutions further in the corporate direction already taken by I1 and I2.[205] Bailey's article on the tangible benefits afforded by good records management focused on the cost reduction, training and space saving possibilities of RM.[206] The use of data and information by HEIs as informing overall organisational strategy and vision would be a clear step away from simply considering records management as a means to save money and operate more efficiently. The usability and value of big data sets was highlighted by P3 and P4. P3 discussed the need for HEIs to show impact on wider society. P4 stated that impact "whether it be from your research, your teaching, you know, beyond the walls of the university, so, that to me is where records and information can really play a part, and so link to that use of data, big data sets, and things like that."[207] Rather than simply proving the tangible benefits of saving money, P3 stated that HEIs should be thinking of information and using it in the same way as other key assets such as money, staff and technology.[208]

The speed with which digital technology moves on was highlighted by all four participants. P4 highlighted that without early input on the requirements of records management within systems, records management would simply be playing "catch-up".[209] P3 was more concerned with the speed at which digital working has developed leaving records management unable to cope, even going so far as to say "it's the electronic record that has killed records management".[210] P3 continued to say that "for most institutions, it's too late to make the change for records

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[205] Sue Childs et al., "Opening Research Data: Issues and Opportunities," *Records Management Journal* 24, no. 2 (2014): 142–62, https://doi.org/10.1108/RMJ-01-2014-0005; Interview 1; Interview 2.

[206] Steve Bailey, "Measuring the Impact of Records Management: Data and Discussion from the UK Higher Education Sector," *Records Management Journal* 21, no. 1 (2011): 46–68, https://doi.org/10.1108/09565691111125107.

[207] Interview 4.

[208] Interview 3.

[209] Interview 4.

[210] Interview 3.

management ever to be truly effective again."[211] In the face of such huge issues in electronic records management, perfection is unattainable, particularly as the same practical drivers fail to push HEIs to consider some of the practicalities around records management.[212] Bott and Edwards' caricatured paper mountain is tame relative to the issue of invisible and ever-expanding electronic storage.[213] Efforts therefore should be driven towards embedding practices around electronic recordkeeping so that it becomes less of a need to catch-up and chase technological development. P3 highlighted the possibilities of online systems and tools in the fact that "things like SharePoint are actually bringing records management to people's desktops".[214]

Systems like SharePoint have the potential to increase awareness of records management and to build RM into the day-to-day work of staff, incorporating the activities into their daily workflow.[215] However, the call for further tools in I2 highlights that despite the ubiquity of digital technologies and systems, digital literacy is not always guaranteed.[216] McLeod states that "proportion rather than perfection, i.e. fitness-for-purpose, is an appropriate approach to progress practice and achieve positive progress".[217] P3 highlighted how "as soon as you start talking about widespread cultural change, or large cost impact that's when you start coming up against resistance".[218] This statement implies that the culture of HEIs, identified in the

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[211] Interview 3.

[212] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions*.

[213] Michael. Bott and J. A. Edwards, *Records Management in British Universities : A Survey with Some Suggestions* (The Library, University of Reading, 1978).

[214] Interview 3.

[215] Lappin and Mcleod, "Investigation into the Use of Microsoft SharePoint in Higher Education Institutions Final Report," 8, 17.

[216] Interview 2.

[217] Julie McLeod, "On Being Part of the Solution, Not the Problem: Taking a Proportionate Approach to Managing Records," *Records Management Journal* 22, no. 3 (2012): 186–97, doi:10.1108/09565691211283147.

[218] Interview 3.

literature review, is still present and may not be receptive to change. This was corroborated by P4 who stated that records management is often seen as an "add-on".[219]

The challenge, then, is not to achieve perfection in the management of records and information held in systems, but to apply what RM functionality is possible within the available systems. P2 highlighted SharePoint's capabilities around version control, metadata, and collaboration.[220] The full implementation of systems designed along MoReq functional requirements used in I4, may be unrealistic in a HE environment where resource and organisational appetite is limited.[221] The current resourcing structure of the institutions in this study revealed that short-term project-based initiatives result in unsustainable or incomplete records management functions without appropriate continuous investment and organisational stability. One of the functional requirements in MoReq is the "disposal scheduling service" highlighted by P1 and P2 as an area to develop electronic RM in their organisation using pre-existing tools within SharePoint.[222] The move towards automation may be a logical step, however the risk averse language used by P1 suggested that it was also a big step.[223]

The importance of understanding how staff interact and view information was put forward by Oliver and Foscarini in their book *Records Management and Information Culture.*[224] The differences in approaches to digital and paper records seen across all four institutions shows staff have not made the transition to thinking

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[219] Interview 3.

[220] Interview 2.

[221] Interview 4; DLM Forum Foundation, "MoReq2010: Modular Requirements for Records Systems" 1 (2010): 39, doi:10.2792/2045.

[222] DLM Forum Foundation, "MoReq2010: Modular Requirements for Records Systems," 24; Interview 1; Interview 2.

[223] Interview 1.

[224] Oliver and Foscarini, *Records Management and Information Culture : Tackling the People Problem*, 38-39.

about electronic records in the same way. Oliver and Foscarini state how "although it may appear the nature of records is clearly understood by employees of organizations, it cannot be assumed that this understanding is sophisticated enough to be routinely transferred to newer formats and systems".[225] Electronic working, as P3 highlighted, means that "Everybody's their own secretary, everybody is their own records manager, people get to choose themselves where they put information."[226] This development is not necessarily a bad thing, but as Foscarini and Oliver state, it is important to know and understand the attitudes towards records and information within the institution, as well as having a robust RM infrastructure in place.[227]

Despite research conducted by Loadman, which suggested that the position of the records manager within an organisation has no effect on how the RM function is viewed, all four participants discussed where their team sits and the impact their place within the organisation's structure has.[228] Loadman's study is now quite old and it would appear the changes in the digital landscape have shifted the professional boundaries around records and information. P3 highlighted the existence of their counterpart as an IT professional and discussed the need for those with RM responsibilities to be at senior board level.[229] By aligning more closely with IT colleagues and having a leadership position, such as Chief Information Officer (CIO), within the organisation, records managers may be better able to advocate for their functions whilst having influence over the use and development of systems.[230]

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[225] Oliver and Foscarini, *Records Management and Information Culture : Tackling the People Problem*, 39.
[226] Interview 3.
[227] Oliver and Foscarini, *Records Management and Information Culture : Tackling the People Problem*, 38-42.
[228] Jane Loadman, "Does the Position of Records Management within the Organisation Influence the Records Management Provision?," *Records Management Journal* 11, no. 1 (2001): 60.
[229] Interview 3.
[230] Interview 1; Interview 3.

The parallel developments of information access legislation and digital technologies has resulted in a breaking down of barriers between records, information and data. The job titles of participants, their areas of responsibility and place within the organisational structure imply a general shift towards information compliance, risk and governance covering everything from official documents to unstructured email. The absorption of data protection responsibilities in the adoption of the Data Protection Officer role of three out of the four participants is evidence of the recognition by the organisation of the skills those individuals possess but also of a wider acknowledgement of the need for these roles to develop to retain their relevance. P3 highlighted how their appointment was as a direct result of information compliance legislation.[231] This presents a distinctive shift from Bott and Edward's study in the 1979 where records management sat firmly within the Library's structure.[232] Although P2 highlighted how some activities around RDM have remained within the Library's remit they also acknowledged that was the wrong place for it. P1's identification of the records professional skillsets as being from traditional librarian backgrounds is changing, with governance, risk and strategy being more prominent concerns to the contemporary records manager.[233] The upskilling of records and information professionals beyond those professional boundaries has been written about by Broady–Preston who stated that to become a polymath whilst remaining true to professional values was the only way to retain relevance.[234] Maintaining the same professional skills was identified as important by P1 but wider knowledge of the IT skills needed to operate in the current and future digital world

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[231] Interview 3.

[232] Michael. Bott and J. A. Edwards, *Records Management in British Universities : A Survey with Some Suggestions* (The Library, University of Reading, 1978).

[233] Interview 1.

[234] Judith Broady-Preston, "The Information Professional of the Future: Polymath or Dinosaur?," *Library Management* 31, no. 1/2 (2010): 66–78, doi:10.1108/01435121011013412.

were also essential.[235] P1 highlighted the urgent need for "people with the skills needed to manage large scale storage of electronic records".[236] The ability to use technology to preserve the historic record of institutions counteracts the stereotypical image put forward by P1 informed by a lack of understanding of historical value of records and information and the people who manage them. If the stereotypical view of a records manager or archivist is not tackled through upskilling in digital areas there is a risk of encroachment of other professionals, particularly in the area of IT. The value of records could become equally more apparent in those institutions who benefit and utilise the long history of their university through their corporate or institutional archive. The ability and investment in systems to ensure the long-term preservation of records was highlighted by P4 as an advocacy tool utilised by the archive and records management team. As universities become more corporate the importance of their corporate archive increases. The ability to contextualise current RM practices amongst staff using the historical records of the institution was felt by P4 to be an invaluable tool.

"[it] does make our life a lot easier because you know, you show people…minute books and ledgers and things…from a hundred plus years ago and they can equate that to the type of records that they're creating today"[237]

The ultimate responsibility for the role must have significant knowledge of the theoretical background (P3) especially as both P3 and P4 discussed how staff may not even be aware of what a record is or needs to be.[238]

The impact of legislation

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[235] Interview 1.
[236] Interview 1.
[237] Interview 4.
[238] Interview 3; Interview 4.

The increased opportunities afforded by the GDPR and the Data Protection Act 2018 was similar to those identified by Procter in 2002, with multiple universities choosing to employ a records professional.[239] However, a reactive approach to the GDPR also had a negative impact on some records management activities in the organisations interviewed. The high-profile nature of the new legislation has taken up much of each of the four participants time requiring them to prioritise tasks and drop activities which may have been more beneficial to the wider development of records management within the institution. P1 stated that work and collaboration across important external networks had stopped due to the lack of time available.[240] P3 stated how there had been no time to dedicate to RM since joining their current institution owing to work being done on the GDPR.[241] The lack of clarity within the legislation also proved a difficulty for P1 with the relatively small changes to the legislation itself having greater impact on records management activities such as retention.[242] The implications of the new data privacy rights, identified by P1, means that accountability and the further opening up of organisations to public scrutiny has had more of an effect in convincing their organisation of the need to prioritise preparations and processes around subject access requests.[243] Out of necessity, specific investment in records management and development was set aside and time given more towards the new legislation. The reactive approach to the GDPR, and information compliance more generally, found in the organisations interviewed, stands in the way of what P2 called "the short term burden" of RM.[244] P2 highlighted

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[239] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 53.

[240] Interview 1.

[241] Interview 3.

[242] Interview 1.

[243] Interview 1; Interview 3.

[244] Interview 2.

how organisations can't see past the initial resourcing of RM, which inhibits long-term investment in the function as a solution to information compliance.[245]

Despite difficulties in three out of the four institutions, compliance with information legislation remains a key driver in HE, particularly around the use of awareness of the law to increase engagement among staff.[246] GDPR proved to be a unification tool across the organisations interviewed. In P1 and P4 there were GDPR working groups in place to discuss common issues across different departments.[247] In this way a new organisation-wide approach to managing data may be beneficial for the overall awareness raising. P4 described the working group as being across academic and non-academic departments showing a need for an approach which bridges the divide highlighted by P2 as being sometimes counter to the overall engagement of the organisation.[248] At a high-level within the organisation, the GDPR and its potential financial implication for non-compliance does have the ability to raise awareness. P3 stated that without the GDPR it is likely no professional would have been taken on in the organisation.[249] The ability to capitalise on the almost universal awareness of the GDPR and the DPA to benefit records management is an opportunity being grasped by those practitioners interviewed, for example in the form of process mapping by P2.[250] The ability of the Regulation to "focus the mind" for fear of financial penalties brought against the institution was highlighted by P4 stating that "nobody wants to be the first institution to get a huge fine".[251]

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[245] Interview 2.
[246] P1 did not identify compliance with the law as a driver.
[247] Interview 1, Interview 4.
[248] Interview 2.
[249] Interview 3.
[250] Interview 2.
[251] Interview 4.

As with the need to develop the skills associated with records management, so has the impact of legislation shaped and driven the direction of the role in relation to information compliance. P1 stated that "There was a little flurry [of focus] around before the GDPR came out but that was very much just talking through what the GDPR was going to bring, a very high-level sense."[252] During the period leading up to and between the introduction and implementation of FoI, the drive to develop HE sector specific guidance resulted in the Jisc infoNet records retention schedule and the business classification scheme off the back of the 'Revision of the Study of the Records Lifecycle'.[253] Both pieces of work, along with the records management maturity model, were as a direct result of information access legislation.[254] As identified in the literature review access legislation can generate new guidance and it seems appropriate to seek chances to do the same with the GDPR. The high-profile nature of the new Regulation is comparable with that of the original Data Protection Act of 1998 highlighted in Edward and McLeod's study of FE colleges.[255] The reactive nature of the activity around the GDPR in the organisations interviewed in this study is similar to that highlighted by Screene in 2005.[256] This was highlighted in I2 and I3 as a high-level issue around the appetite for developing records management, and in I1 and I4 as a resourcing issue.[257] P3 identified the need for practical guidance as created by the ICO around records management however there has been little put forward by Jisc in the approach to the GDPR implementation date.[258] Without sector wide guidance it is difficult to implement the management of

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[252] Interview 1.

[253] Jisc, "Revision of the Study of the Records Lifecycle."

[254] Jisc infoNet, "Guidance Notes for the Records Management Maturity Model"; Jisc, "Revision of the Study of the Records Lifecycle."

[255] Edward and McLeod, "Is the Freedom of Information Act Driving Records Management in Further Education Colleges?" 47.

[256] Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?" 34.

[257] Interview 2; Interview 3; Interview 1; Interview 4.

[258] Interview 3.

information required to ensure compliance across a disparate organisation. Legislation has the ability to open up discussions around issues of information compliance. P1 identified that these discussions are being called for in the types of external network they are part of.[259] The concern is to keep these discussions going and not let them become localised. If there is a collective effort to change, as highlighted by P3 around statutory returns, then open and widespread discussion across the HE sector would be beneficial.

Guidance, Jisc and the Higher Education sector

All four participants identified the importance of the Jisc infoNet retention schedule with P3 stating that it "provides…a springboard that then you can take that and then tweak it slightly, for your own organisational needs".[260] However, there is no denying the age and therefore questionable relevance in the current HE context. The applicability of the Jisc tools was an important point raised by P4 who highlighted how the theory around retention and disposal of records was implicit across both paper and electronic formats:

> "in theory the retention is in place, so the retention schedules, our retention schedules are irrespective of whether it's paper or electronic, where there's a difference that will be highlighted on the schedule, but essentially…it applies to both paper and digital"[261]

The theory behind applying records management exists as it always has. However, in the case of electronic records, the theory doesn't meet the practice with problems occurring around the implementation across a multiplicity of systems.[262] It is clear from the interview data that the sector context has moved on and the guidance hasn't followed.

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[259] Interview 1.
[260] Interview 3.
[261] Interview 4.
[262] Interview 4.

The differing attitudes from participants towards the Jisc retention schedule

shows how, despite a basic level of supposedly attainable standardisation across HE

in this area, the individual needs of the organisation must be taken into account in

the implementation. P1 and P3 stated that the granularity is not workable, however

P2 highlighted a desire for the tools to be more detailed stating that "I do find that

sometimes it doesn't cover what we need it to cover, but…as a model, how far can

they go in being so granular".[263] In order to cover all bases P2 cited the Limitation Act

of 1980 as providing a better point of reference with the Jisc retention schedule as

supplementary.[264] The area of retention in I1 was of concern, particularly around

financially viable data like that produced through research.[265] P1 and P3 indirectly

and directly voiced support for the big-bucket methodologies developed by NARA in

the US and outlined in their 'Flexible Scheduling' report.[266]

If Jisc are considering a review of the retention schedule, it may prove difficult

to reconcile the needs of the HE sector who have, arguably in the face of an

expansion in digital records, taken different paths to implementing appropriate

retention and disposal of records. This is particularly important considering the data

from the interviews showed that retention and disposal were the areas causing the

most tension. If, as P3 stated and echoed by McLeod, everyone is now their own

records manager, they need to be equipped with adequate risk-based guidance that

is "fit-for-purpose".[267] The 'Revision of the Study of the Records Lifecycle' suggested

the need to update guidance around records management every two to three

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[263] Interview 1; Interview 3; Interview 2.

[264] Interview 2.

[265] Interview 1.

[266] Interview 1; Interview 3; National Archives and Records Administration, "Flexible Scheduling," 2004, https://www.archives.gov/records-mgmt/initiatives/flexible-scheduling.html.

[267] Interview 3; McLeod, "On Being Part of the Solution, Not the Problem: Taking a Proportionate Approach to Managing Records," 191-193.

years.[268] Despite the existence of guidance to accompany the Jisc infoNet retention

schedule and business classification scheme, P3 stated that 'how-to' guides for RM,

similar to those produced by the ICO, would be immensely useful in the practical

implementation of records management.[269] The lack of reference to existing guides

suggests that existing guides are no longer relevant.

The HESA published statistics in the previous reporting year which indicated a

rise in the income generated through corporate function within HEIs. The changing

face of HE towards a more commercial outlook was explicitly stated by P1 who also

called for increased sector guidance around the management data. The importance

of research data and the need for that data to be accessible and available for long

periods of time has important financial implications. The failures in the current

guidance around research records may become more apparent as the reputation of

the HE as a potential business partner is put under scrutiny. Again, as above, there

is guidance available which accompanies the Jisc retention schedule but it's lack of

reference indicates a lack of awareness around its existence.

There are still clear and definite links to the wider public sector in the

legislative and digital contexts. P3 identified the implications for the public sector in

Section 46 of the Lord Chancellor's Code of Practice and in article 30 of the GDPR

which requires the management of records and recording of processing activities for

data across public-bodies.[270] The suggestion by P3 for a statutory return on RM from

HEIs "where you have to demonstrate what your records management approach

was" echoes what Screene had written optimistically about the proposed legislation

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[268] Jisc, "Revision of the Study of the Records Lifecycle."

[269] Jisc infoNet, "Higher Education Business Classification Scheme and Records Retention Schedules"; Interview 3.

[270] Interview 3; "Art. 30 GDPR – Records of Processing Activities | General Data Protection Regulation (GDPR)," accessed August 30, 2018, https://gdpr-info.eu/art-30-gdpr/.

to mandate RM put forward by TNA.[271] P1 stated that "the need to have good records management, has never been a part of data protection or information compliance law that's been given much attention".[272] Without mandating legislation or providing the external driver most HEIs need to respond adequately to records and information management requirements, it is possible the function may never develop beyond the minimum compliance requirements of the organisation.

Characteristic of the HE sector is the academic/non-academic split highlighted by P2:

> "however…much you try to…compress or collapse the difference there is a split, so you have professional services staff who are doing all the admin at various different levels, and then you have the academic staff who are doing their own business…but they're also doing their research and they've got research data, and they don't always see themselves, or see their administrative function, in the same way that maybe a member of the professional services staff in their department would."[273]

Data from the HESA from 2016/17 showed an almost equal number of academic to non-academic staff in UK HEIs.[274] If P2's statement above is true across the wider HE sector, then the context has not changed dramatically from the time of Procter's article in 2002 where the same divide presents itself.[275] The inherent cultural split in HEIs may well be tackled by reorganising the structure as in I2.[276] Bott and Edwards highlighted the importance of clerical staff to the administration of HE records in the 1970s, and it is possible that with the loss of the resource in record clerks and admin in each department the responsibility was not explicitly assigned elsewhere.[277] As P4

[271] Interview 3; Screene, "How Prepared Are Public Bodies for the Implementation of the UK Freedom of Information Act, in January 2005?" 42.
[272] Interview 1.
[273] Interview 2.
[274] HESA, "Staff," 2017, https://www.hesa.ac.uk/data-and-analysis/staff.
[275] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 52.
[276] Interview 2.
[277] Bott and Edwards, *Records Management in British Universities : A Survey with Some Suggestions,* 15-16, 22.

highlighted, the only way to make devolved responsibility a success is to make it explicit within the job roles of designated staff members.[278]

Conclusions

The findings show that there is no one way to manage records within a Higher Education institution. Jisc can provide the baseline but those tools are out of date and the accompanying guidance seemingly not consulted. An increase in the use of digital systems has exacerbated the hybrid records and information environment. Resource is still largely reactive in the face of new information compliance law as it was in the early 2000s with the introduction of FoI. However, there has been a marked increase in the records professionals employed by HEIs to manage their records, or of resource allocated within another compliance role. External drivers still play the most part in providing resource to move records management in HE forward, although some tailored approaches, such as considering individual departments and staff needs, has some success.[279] The sustainability of the one-to-one approach in the face of ever increasing electronic storage of records and information is unclear. Increasing investment into systems like SharePoint requires individual staff members to take charge of their own information if it is to be managed appropriately. To bring it back to McLeod "everyone is a records manager (with a lower case "r" and "m"), not just in principle but in practice…the role of the records manager (professional) is strategic and enabling, horizon scanning and focused on our role in solving "big challenges".[280] The investment in system tools and the need for a point of contact across the devolved and often fragmented structure and culture of HEIs would help ensure the position and relevance of RM for the future.

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[278] Interview 4.

[279] Interview 1.

[280] McLeod, "On Being Part of the Solution, Not the Problem: Taking a Proportionate Approach to Managing Records," 191.

Ceri Lumley

Chapter 5 - Conclusion

Despite the limitations of this small sample group it is clear that the way in which records are perceived has changed dramatically with the developments in digital technologies over the last fifteen years. Coupled with the impact of new information access legislation, records management, or more accurately records and information management, has evolved to adopt and absorb information and data concerns whilst keeping one eye on the institutional memory and the corporate record of the institution. The findings of this study show that records management remains a long-term investment. The ever changing, yet often reliably devolved, organisational structure of HEIs means that often there is no 'one size fits all' approach to records and information management. The need for tweaking and adapting guidance and implementation is evident in relation to record types, individual systems and in the differences in approach between paper and digital records.

The importance of Jisc and the guidance they produce is still evident. Difficulties in the application of the current Jisc tools, particularly the retention schedule, should not overshadow the understanding within the sector that these resources provide an important baseline from which institutions can develop and improve. A review of the Jisc guidance would be much welcomed by the sector and the differences in practical approaches, in big-bucket and granular retention, should be considered in the review process. The review would need to ensure any future iteration of the schedule reflects the needs of not only those developing further guidance for their organisation, but the staff across the departments and areas who will be implementing these practices day-to-day.

By considering records management holistically within the HE sector this study has highlighted key areas for further research. The first area is around the impact that digital work has had on recordkeeping practices. The second is around highlighting the opinions of those carrying out the practical recordkeeping activities, particularly around records which have no statutory instrument. This study has focused on the individual or team undertaking the records management function which has given an idea of the overall responsibility held within the organisation. Understanding how records and information management is viewed and valued across the organisation, in academic and non-academic functions, might provide insight into areas for improvement in overall strategy. As with technology it would be of use to update the situation on the GDPR once the initial period of adjustment is over. In a similar way to studies conducted by Shepherd et al and Shepherd and Ennion in the wider public-sector, it would be useful to know whether or not the desired benefits hoped for in RM were delivered as a result of work around the GDPR.[281] Finally, Bott and Edwards' survey of 1978 provided valuable and comprehensive data about the situation in relation to records management nationwide. Widening the questions asked in this research in a UK wide survey would establish how far reaching the views expressed by these four participants is.

There was still an overall feeling of optimism from the participants of this study at the prospects both the GDPR and technology can bring. Procter may have had hopes for uniformity in records management across HE, but this may not be achievable in our current legislative and digital landscape.[282] However, the solid

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[281] Shepherd, Stevenson, and Flinn, "Records Management in English Local Government: The Effect of Freedom of Information," 2011; Elizabeth Shepherd and Elizabeth Ennion, "How Has the Implementation of the UK Freedom of Information Act 2000 Affected Archives and Records Management Services?," *Records Management Journal* 17, no. 1 (2007): 32–51, doi:10.1108/09565690710730688.

[282] Procter, "One Size Does Not Fit All: Developing Records Management in Higher Education," 53.

baseline of Jisc, coupled with professional links between institutions, means a standardised and strong foundation can still be established from which there is only room for improvement.

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Appendices

Appendix A - List of search terms used for the literature review

"Information manager" "Higher Education"
"records management" "public sector"
"records management" UK
"records manager" "Higher Education"
"records manager" "public sector"
"records manager" universit*
"records" "Higher Education"
"records" "public sector"
"records" "universit*"
"Information Governance" "Higher Education"
Information management in Higher Education
Information management universities
Joint information systems committee JISC
Records management in universities

Appendix B – Full list of interview questions

AIMS AND OBJECTIVES (Use as basic questions if time is limited)	
Overall aim – To explore the delivery of records management in a higher education academic context	
How does the records management role work in practice? Who is doing the role of RM? What tools are used and why?	
What are the key drivers behind records management in a HE environment?	
How should RM in HE institutions be looking to develop and adapt	

Question 1	**Notes**	**Complete ?**
Who is doing the role (continued from consent form) How is RM carried out in your organisation?		
Pointer questions		
1.1 How is RM carried out day-to-day?		
1.2 How much does formal policy and guidance help those responsible for RM day-to-day RM function? / How well do you feel your current guidance is working?		
1.3 (If no network of staff/champions) Is the responsibility for RM devolved across the organisation?		
1.4 (If there are records champions) What are the main issues highlighted by the record champions within their departments/directorates?		
1.5 Is there a working group/steering group/committee around records management – who is this made up of/How was it		

formed?		

Question 2	Notes on response	Complete?
Why What are the main drivers behind RM in your organisation?		
Pointer questions		
2.1 How are records viewed within your organisation? E.g. evidence, information to inform decision making, audit purposes, research data		
2.2 Is there a link between the RM function and the research data management function (if it exists)? Do you think there should be?		
2.3 Do you feel the RM function is supported and valued in your organisation, why? - By staff - By top-level management		
2.4 How much does information access legislation drive records management in your organisation? - FOI - DPA/GDPR - EIR		
2.5 How much does compliance drive records management in your organisation? - Financial - Legal		
2.6 Are there any other drivers which you have identified as significant within your organisation or within the HE sector?		

Question 3	Notes on response	Complete?
How does RM work in practice? (Continued from the tools and standards section)		
Pointer questions		
3.1 How valuable are the available		

tools you use (outlined on your consent form) to carrying out records management in your organisation/Are the available tools adequate for carrying out records management?		
3.2 Do you find JISC a helpful support? Could it do more?		
3.3 How does your organisation manage electronic records? Including email, websites and social media, MS Office files etc		
3.4 How do you ensure information is appropriately retained, kept and destroyed?		

Question 4	Notes on response	Complete?
How should RM in HE institutions be looking to develop and adapt in the future?		
Pointer questions		
4.1 What one change within your organisation would provide the biggest positive impact on the RM service?		
4.2 What will be the main opportunities or challenges for records management in your organisation in the future?		
4.3 What do you see will be the main opportunities for records management in the HE sector more generally in the future?		
Question 5		
Is there anything further you would like to add?		

Ceri Lumley

Appendix C – Example consent form

Does One Size Fit All? Exploring records management in the UK higher education sector.

Consent form and questionnaire

By signing this consent form, you are agreeing to take part in the above titled InterPARES research project. A separate information sheet is attached which should be read in conjunction with this form.

Please tick each of the boxes to confirm you have understood the conditions of taking part. If you have any comments or questions, please get in touch with Ceri Lumley at ceri.lumley.16@ucl.ac.uk.

Confirmation of information received

I have read and understood the information provided in this consent form and the information sheet	
I have had an opportunity to ask questions and discuss the research	

Agreement to take part in the interview

I agree to take part in the interview	
You may keep and use my personal details to communicate with me about the research	

Recording of interview

I agree to the recording of the interviews. I understand I will be made aware during the interview at which points recordings are happening.	

Use of contributions

I agree to the use of my contributions made during this interview being used in publications, presentations and other outputs. All quotations will be anonymized.	

Anonymity or acknowledgement (tick one box in this table)

I would like to be anonymous and referred to by a unique identifying code	
I would like to be credited by name as having participated in the research where appropriate	

Ceri Lumley

Please indicate your profession. This may be used for context around your discussions, so please record this as you would wish it to appear.
Please indicate your job/role title:
Please give a brief overview of what your role entails:

Does your organisation have a dedicated records management post? (Y/N)	
If yes to the above, how long has the records management post existed?	
Does your organisation have a records management policy? (Y/N)	
Does your organisation have a/any retention or disposal schedule? (Y/N)	
Please indicate where the records management function sits within your organisation's structure.	
Which other directorates/departments are your main partners in facilitating records management?	
Is there a network of staff who help facilitate records management within the organisation? e.g. Champions (Y/N)	

Please indicate which of the following areas your role covers (please mark all that apply)	
Records	
Information	
Data	
Knowledge	
Compliance	
IT	
Legal	
Other (please specify):	

Please mark to indicate which standards and available practical tools you use in relation to records management (please mark all that apply)	
JISC Business Classification Scheme (BCS)	
JISC Higher Education Records Retention Schedule	
JISC Impact Calculator	
JISC Records Management Maturity Model (please give maturity score)	
Functional analysis	
Big bucket methodologies	
DIRKS manual	
CESG Information Assurance Maturity Model (please give maturity score)	
ICO Privacy Impact Assessment	
ISO 15489-1:2016	
Records surveys	
Other (please specify):	

Name (please print)	Email address and/or contact number

Signature	Date

Appendix D – Example project information sheet

Does one size fit all? Exploring records management in the UK Higher Education sector

Project Information Sheet

Research Partners: UCL (University College London)

Details of Study:
This research aims to explore the role of records management in the Higher Education (HE) sector today. Records management within the higher education sector presents a unique area for which there is little available research from the past fifteen years. This research aims to investigate the current records management situation within HE including who is undertaking the role of Records Manager, how does the records management function in practice day-to-day, and what the key drivers are behind the function. The research also aims to scope future opportunities in records management within HE as perceived by the practitioners.

This research is being conducted using semi-structured interviews.

Research outcomes
The outputs from this work will be a report for the InterPARES Trust and a Master's dissertation. In addition, there may be a journal article, presentations, and a blog piece. The work should identify opportunities for reflection upon best practice of records management in HE and accommodate acceptance of a more flexible way of approaching the practice. There may also be practical suggestions for the improvement of tolls available within the sector including the Jisc retention schedule.

How can I help?
I would like to invite you to participate in a semi-structured interview. You have been identified through a priori criteria sampling as someone who will be able to contribute an in-depth knowledge of the practice of records management within a HE context. The interview can take place in person or by phone depending on your preferences. The interview will last no longer than an hour.

Will I be named or identified in the research?
You can choose whether you want to be named or remain anonymous. If you chose to be anonymous you won't be identified in any publications or presentations. You will be given a unique number which will be used instead of your name. Any contributions you make that could identify you because they are very personal or specific to you (e.g. the time, date and place that something happened) will not be used. If you name anyone else in your contributions, then I will replace their name with a pseudonym and make every effort to anonymise the data.

Will the interview be recorded?
I will be recording the interview and you will be made aware that this is happening. This is being done in order to include quotes to provide context for the findings in the final report. The audio recordings will not be shared.

How will your information be held?
All personal information (e.g. your contact details) is collected and stored in accordance with the General Data Protection Regulation, the Data Protection Act 2018, UCL's Data Protection Policy and Research data management policy.

The audio files and transcripts will be stored on a research database that only Elizabeth Lomas will be able to access. The data will be kept for the duration of the project and then retained in accordance with UCL policies. All information will be held securely on UCL storage. This research has been approved by through the UCL Research processes.

Can I withdraw from the research?
Yes, you can withdraw from the research at any time without giving a reason.

What will happen to the research?
I will use the information I collect to produce a report for the InterPARES Trust which I will share with you. I will also produce a UCL dissertation. In addition, I will speak about the research at conferences, and publish news pieces and articles about what I have found.

Are there any risks to being involved?
I will be open and honest with you throughout the research and do everything I can to minimize risk to you. I will check the transcription (produced as a result of the interview) with you ahead of submitting the final report. You can ask for parts of your contribution to be removed if you would prefer them to be confidential provided you inform us ahead of any publications.

What are the benefits of being involved?
The benefits of being involved are around raising awareness of records management as a discreet and valuable function within the HE sector. By not only reflecting on the past your contributions will provide important insight into the current situation of records management. It is hoped that this research will make a contribution to the awareness and impact of available tools which will better equip other and future practitioners working in a similar area. It is also hoped that your contribution will open up a further dialogue around the drivers of RM in HE. If we can understand these drivers we can begin to think strategically and dynamically to influence and advocate further for the practice of RM in this area. You may choose to be credited for taking part in the interview or to be anonymised in any outputs from these discussions.

Project contacts:
University College London:

Researcher: Ceri Lumley, UCL MA Archives and Records Management: ceri.lumley.16@ucl.ac.uk

Project Supervisor: Dr Elizabeth Lomas: e.lomas@ucl.ac.uk

If you have any comments or questions, please do not hesitate to get in touch
ceri.lumley.16@ucl.ac.uk

Appendix E – Example email text confirming anonymisation

Dear [insert name],

Many thanks once again for taking part in the interview process. The interview was incredibly valuable to the study.

I have now typed up the interview as a full transcription. Please could you check through and approve the changes that I have made as per your request for anonymization.

If you could reply with any corrections and I will be happy to make any amendments. There are a couple of square brackets where if you can clarify what is said I would be very grateful.

Kind regards,
Ceri