

SAFE WELL PROSPEROUS CONNECTED

Information Governance Framework

Schedule 01A Records Management Policy

Background Information	
Document Purpose and Subject	To provide a council-wide policy for Records Management
Author	Information Governance Team.
Document Owner	Information Governance Team.
Change History	V3.4 - The policy has been updated to reflect updates to council design. The policy has also been updated to remove the storage standards from Appendix A. These are now included in the Records Management Guidance process that sits under this policy.
File Location	Information Governance Shared Drive
Retention Period	Permanent Preservation as a Core Policy.
Issue Date	28 April 2020
Last Review	January 2019
Current Review	January 2020
Next Review Date	January 2021
Approved By	Cabinet Member
Approval Date	27 March 2020

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1. Introduction

North Lincolnshire Council creates, receives and handles vast amounts of information that is considered a key council asset. It is vital that these assets are maximised through effective policies and procedures, to inform decision making, improve accountability, and enhance services to individuals.

In order to maximise the effective and efficient use of information it is crucial to have a corporate view on how it is managed, created, stored, retrieval, retention, disposal and the sharing of information effectively and consistently.

The aim of this policy is to set out how records will be managed and how relevant regulatory frameworks and standards for managing information will be applied, to ensure that:

- Accurate, authentic and reliable records are created and captured;
- Records are maintained to support and enhance on-going business and customer service needs, comply with accountability requirements including the facilitation of audits and meeting community expectations;
- Records are managed efficiently and can be easily accessed and used for as long as they are required;
- Vital records are identified and protected;
- The rights of the council, its clients and any other person affected by its actions are protected;
- Records are disposed of in an appropriate manner when no longer required; and
- Legal and statutory requirements are met.

This policy is part of a suite of Information Governance policies and procedures.

2. Scope

This policy applies to all council employees and all individuals or organisations acting on behalf of the council.

Schools, who are Data Controllers in their own right, may choose to adopt this policy but where this is not the case it is expected that they will have their own appropriate policy.

3. Associated Processes and Documentation

Associated Records Management process documents and forms are in place to aid compliance with the Records Management Policy, as follows:

- Records Management Guidance - NLCPR05

- Records Store User Protocol - NLCPR04
- Records Destruction Form – IG01
- Records Transfer Form – IG02
- Record Storage Box Label – IG03.

4. Legislation and Standards

Good records management enables compliance with requests for information under legislation including the Freedom of Information Act, Environmental Information Regulations and General Data Protection Regulation / Data Protection Act 2018. The production of our Publication Scheme is also dependent on records being properly managed and this again enables compliance with the Freedom of Information Act.

A Code of Practice under section 46 of the Freedom of Information Act sets out recommendations for the management of records. This is divided into two parts:

- Part 1: Records Management;
- Part 2: Review and Transfer of Public Records.

The GDPR in principle five states that information should not be kept for longer than necessary and principal seven of the GDPR states that information must be kept secure.

We aim to comply with the principles of the following standards for the management of records and take them into consideration when decisions about records processes are made:

- ISO 15489 - Management of Records Standard.
- BS BIP 0008 - Legal Admissibility Standard.

5. What is a Record?

It is important to make the distinction between what is and is not a record. According to the ISO 15489 standard for the management of records, a record is:

‘Information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business.’

Information is considered to be a record for the purposes of this guidance when it exists in any form that requires effective management and preservation. Records include:

- Correspondence.
- Payroll documents.

- Case files.

Some information and documents need to be kept as records, because they do not require the same rigour of management as that required for records. These information and records can be disposed of during the normal course of business once they have served their useful purpose.

Examples of information and documents that are not records include:

- a) Compliments slips;
- b) Catalogues and trade journals;
- c) Telephone message slips;
- d) Non-acceptance of invitations;
- e) Trivial electronic mail messages or notes that are not related to council business;
- f) Requests for stock information such as maps, plans or advertising material;
- g) Out-of-date distribution lists;
- h) Superseded stationary and forms (unless controlled);
- i) Secondary copies taken to meetings;
- j) Reference copies of annual reports; or
- k) Working papers that lead to a final report.

6. Records Management Lifecycle

All records go through a lifecycle, from creation to disposal. At all stages of this lifecycle, processes are used to ensure compliance with policy and legislative requirements. Records Management Guidance has been produced for employees and each service has a record keeping system in place (paper or electronic) to ensure compliance.

Record Creation - When records are created or received they will be classified and indexed so that they can be retrieved quickly and easily. Systems will ensure:

- Accurate, authentic and reliable records are created and kept;
- Indexing to ensure quick and efficient retrieval;
- Procedures for keeping records up to date;
- Metadata to enable the understanding of records;
- Procedures and guidelines for document control, and
- The ability to cross reference electronic and paper records.

Record Processing

Records could be processed at any point (have something done to them) in the lifecycle in order to achieve business aims.

Record Storage

Records need to be stored in a way that keeps them secure.

Retrieval and Access

Records will to be available when appropriate to allow the council to function effectively. Providing this availability requires controls to manage records, such as procedures to control access to records and the movement of records.

Retention and Disposal

If records do not need to be retained permanently and have outlived any business or statutory requirement to be retained they will be destroyed.

Retention of records is based on our Records Retention Schedule that sits as appendix A of this policy. Retention rules are either based on legislation or on a business rule/common practice calculated from a need and risk perspective.

Retention periods specify the minimum time a record should be kept and what action should be taken at the end of that period. This is called a review. The retention period will commence from a trigger event (such as the closure of a file).

Reaching the end of the minimum retention period does not always mean the record will be destroyed. In some cases the record will be retained longer or transferred to permanent archive. Records being retained longer will be assigned a further review date that will be updated at each future review.

Disposal of records documentation will be kept when a record is disposed of using Destruction Form IG01. If records are transferred to official archives for permanent preservation Transfer of Records documentation will be kept using Transfer Form IG02.

Destruction will be carried out in accordance with its level of sensitivity and in line with our Information and ICT Security Policies.

7. Management of Electronic / Digital Records

The principals that apply to the management of electronic records are generally the same as those for the management of any record, but how the principles are put into practice sometimes differs.

Effective electronic record keeping includes:

- The creation of metadata necessary to identify documents should be part of the electronic system that holds the records, including naming so that the record can be identified and version control.

- The maintenance of a structure of folders or a naming convention within the electronic system to reflect logical groupings of records.
- Measures to ensure the integrity of electronic records to prevent accidental or unauthorised alteration, copying, moving or deletion;
- The accessibility, use and preservation of electronic records for as long as required (which may include their migration across systems).
- The application of appropriate disposal procedures including marking records as 'inactive and/or anonymisation.
- The ability to cross reference electronic records to their paper counterparts or those in other electronic systems, in a mixed environment.
- The ability to retain and dispose of emails in line with this policy.

Audit trails will be kept where appropriate for all electronic records.

Appendix A – Records Retention Schedule

Not published.