Records Management Policy

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Corporate Policy & Governance

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Approved by: *Name or Committee*

1. Scope

1.1 This Policy applies to all Stroud District Council employees and members. Agency workers or sub-contractors who are required to use the Council's information systems will also be made aware of and be expected to abide by this Policy.

2. Purpose

2.1 This Policy is part of a suite of Information Governance policies and this policy is to set out requirements and responsibilities for managing records, retention and disposal and to reduce the risk of breaching the General Data Protection Regulation. This covers all Council records irrespective of however they are held (including but not limited to, on paper, in electronic formats including information collected by the Council's CCTV cameras), the system in which they are held, or storage location.

2.2 This Policy and the framework of supporting policies, standards and guidance aims to make all staff and third parties aware of their responsibilities and what they must do to properly manage the Council's records and information.

2.3 This Policy requires contracts and agreements entered into by and with the Council to contain appropriate requirements for records and information to be managed in line with this Policy and supporting standards and guidance where:

- Contractors or other bodies create or receive and hold records on behalf of the Council
- The Council creates or receives and holds records on behalf of other organisations
- Records are created or received and held as part of collaborative working.

3. Introduction

3.1 Records management is an essential part of enabling the Council to achieve priority outcomes and is vital to our being able to deliver efficient and effective value for money services.

3.2 Effective records management will help to ensure that we have the:

- Right information when we need it to make informed decisions
- Evidence we need to account for our actions and decisions allowing us to be open, transparent and accountable, as well as, providing evidence of compliance.
- Records required to protect the interests of the Council, its staff, citizens and organisations who interact with the Council.

3.3 Stroud District Council will aim to create, receive and manage records efficiently, protect and store them securely, make them accessible where possible and dispose of them safely when they are no longer needed.

3.4 To support this Policy, we will:

- Provide a framework of supporting policies, standards, procedures and guidance
- Develop and implement a strategy to improve the way we manage records and information
- Provide appropriate staff training
- Monitor Compliance

3.5 Specific requirements for keeping and disposing of records are contained within the Council's records retention schedules. All records must be disposed of in line with our records retention policies contained in the schedules. Any divergence from the records retention and disposal policy must be for legitimate reasons and be authorised by the Data Protection Officer (DPO) and SIRO.

3.6 There should be procedures developed to ensure that when a record reaches retention it is identified, reviewed and then retained or disposed of. Disposal must be approved by someone with authority to do so. The records should then be securely disposed of or transferred to Gloucestershire Archives for permanent preservation. The Procedures should be implemented and considered part of the normal business process. The Records Storage Receipt Form should be completed for records that you wish to send to the Archives for storage. Once completed, the form should be sent to archives@gloucestershire.gov.uk . The collections team can also be contacted on 01452 425294 to answer any queries.

3.7 Records should be securely disposed of taking into account the sensitivity of the content and should be appropriate to their storage media and format.

4. Records Management

4.1 As a public body the Council is required by law to manage its records properly. The Local Government Act 1972, Data Protection Act 2018, General Data Protection Regulation, Freedom of Information Act 2000 and other legislation sets out specific requirements in relation to the creation and management of records with which the Council must comply.

4.2 The principles of records management are to ensure that records are managed throughout their lifecycle from creation or receipt, maintenance and use to disposal or permanent retention.

4.3 Good records management practice relies on the following:

- Determining which records should be created or received and retained

- Determining appropriate related data (metadata – information describing content, context and structure of records to allow them to be linked with the business process from which they were created)
- Determining corporate record systems for the storage and management of records
- Creation or receipt of required records and their capture into corporate record systems together with related metadata
- Development of appropriate locating aids such as classification schemes and indexes to facilitate the management and retrieval of records and information
- Appropriate maintenance of records in safe secure environment(s)
- Determining why and how long records should be kept and how they should be disposed
- Retaining records only for as long as they are needed to satisfy legal, regulatory requirements and operational needs
- Routine, timely and secure disposal of records in line with the Council's retention and disposal policies

Routine disposal of temporary documents and information (non-records)

4.4 The benefits of adhering to these principles are that records and information will be:

● Accurate, up to date and reliable

● Quickly and easily located, retrieved, identified and usable

● Protected and stored securely

● Available for as long as required and disposed of at the right time. This will help us to provide efficient, effective value for money services to meet our corporate priorities.

4.5 This policy is supported by a set of Council policies, implementation strategy, standards, procedures and guidance. Together these form the Council's Information Governance Framework.

4.6 The documents contained within the Information Governance Framework:

● Define how the Council's Records must be managed

● Promote best practice and improve the way we manage our records and information

● Support increased use of electronic records as a means of gaining organisational benefits without increasing risk

● Enable records management compliance to be monitored

4.7 These documents are available to all staff via The Hub and selected documents are published on the Council's internet site.

4.8 The Council will establish a strategy setting out direction and priorities for the organisation and key deliverables with the aim of improving the way we manage records and information to ensure we can meet our obligations and deliver our commitments.

5. What are records?

5.1 'Records' are defined by the relevant British Standard ISO 15489 as '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'.

5.2 This policy, together with the associated policies, standards and guidance, applies to the management of all records in all technical, digital and physical media and formats created or received by the Council or on its behalf in the conduct of its business activities (including email and any other form of electronic communication used by the Council in the conduct of its business).

5.3 This policy applies to all records owned by the Council whether they are created or received and managed by the Council or by third parties on its behalf.

5.4 The same principles should also be applied when working collaboratively and to records created or received and managed by the Council on behalf of other bodies

6. Paper Records

6.1 Paper records should be "Closed" in line with the relevant retention trigger defined in the individual Service retention schedule. If records no longer need to be frequently accessed, they may be transferred to Gloucestershire County Council Archives for permanent preservation. The Records Storage Receipt Form should be completed for records that you wish to send to the Archives for storage. Once completed, the form should be sent to archives@gloucestershire.gov.uk . The collections team can also be contacted on 01452 425294 to answer any queries.

6.2 Each Service area must ensure that paper records are retained, reviewed and securely disposed of in line with the Records Management Policy and associated retention schedules.

7. Electronic Records

7.1 Electronic records e.g. in shared filing, in line of business systems, or personal systems such as folders or email accounts are all subject to records retention and disposal policy and should be disposed of in line with relevant the Council's policies, standards and guidance.

7.2 Effective electronic record keeping requires:

● The creation of metadata necessary to identify documents, should be part of the systems which hold the records. (Metadata is information about when an object was created, who created it, when it was last updated etc. For electronic data this is captured by computers.

● The maintenance of a structure of folders to reflect logical groupings of records.

● The secure maintenance of the integrity of electronic records to help prevent accidental or unauthorised alteration, copying, moving or deletion;

● The accessibility and use of electronic records for as long as required (which may include their migration across systems).

● The ability to cross reference electronic records to their paper counterparts in a mixed environment.

● The ability to retain and dispose of emails in line with this policy. These guidelines will be further developed in the future.

7.3 Audit trails should be provided where appropriate for all electronic information and documents. They should be kept securely and be available for inspection by authorised personnel.

8. Information Assets Register

8.1 The council is required to hold an Information Asset Register that records assets, systems and applications used for processing or storing personal data across the organisation. In line with expectations, this register should include:

- Asset owners
- Asset location
- Retention periods
- Security measures deployed including access/permissions

8.2 The Information Asset Register should be reviewed periodically to ensure it remains up to date and accurate and the council should risk-assess assets within the register and make sure that the hardware asset inventory remains accurate.

9. Why do we need to manage records?

9.1 Implementing appropriate, efficient and effective records management practices as a routine part of business processes will help us to achieve our priority outcomes for delivering services, meet statutory requirements and evidence compliance, and enable us to be open and accountable.

9.2 In adopting this policy, we aim to ensure that records are complete, accurate, up to date, usable, reliable, ordered, and accessible when needed. Doing so will help us to:

● Carry out our business efficiently, effectively and continuously
● Make consistent properly informed decisions
● Protect the rights of the Council, its employees, partner organisations and citizens
● Comply with legislation and regulations
● Make sure we are open, transparent and responsive
● Meet obligations for disclosing information

10. Access Control

10.1 Each Service area must ensure that they limit access to personal data to authorised staff only and that they regularly review users' access rights.

10.2 Each service area should maintain a log of which staff have access to systems holding data and that regular reviews of this log take place, removing access rights when an employee changes role or leaves the council.

11. Retention & Disposal

11.1 The Council has and maintains corporate Retention Schedules to establish the minimum time records should be kept for and to document the action that should be taken at that point. This is accessible on our website under Retention Schedules.

11.2 The schedules for each Service Area will state whether the retention period is based on legislation or business need, where there are no legislative requirements. If business need is assigned, we will assign a 'local rule' retention period based on the business need and risk.

11.3 The 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 disposal period will commence from a trigger event (such as the closure of a file). Reaching the minimum disposal date does not always mean the record should be destroyed. In some cases, the record may be retained longer or transferred to permanent archive.

11.4 All records will be disposed of in accordance with the retention schedule. Any errors in the scheme should be highlighted to the Information Governance Team immediately. Any records being considered for disposal outside of the schedule disposal date should be discussed with the Information Governance Team prior to destruction.

11.5 Disposition is necessary to comply with the General Data Protection Regulation in line with the minimisation principle, that records containing personal data are only kept for as long as necessary. It is also required for the efficient administration of Council records, keeping physical or electronic storage to a minimum and not hindering access to information that is still required, such as that needed to respond to Freedom of Information or Environmental Information Regulation requests.

11.6 The retention and disposal process aims to ensure that:

● An intended disposal/review date is captured when creating records or receiving all records.
● Retained records are reviewed in accordance with the Retention Schedule and those records reaching the disposal date are considered for disposal.
● When records reach the disposal date the relevant inventory will be updated to reflect the action taken.
● Disposal of records documentation will be completed and retained whenever a Record is disposed of in accordance with guidance from The National Archives. This may be necessary to provide evidence that a record is no longer held, for example in response to a Freedom of Information request.
● If records are transferred to official archives for permanent preservation transfer of records documentation will be completed and retained.
● Records subject to an outstanding request for information or legal proceedings will not be destroyed until after the request has been answered and/or the legal proceedings are completed.
● Destruction will be carried out in accordance with its level of sensitivity and in line with the Council's Information Security and Transportation, Transfer and Sharing of Data Policy.

12. Roles and responsibilities

12.1 The Council has a corporate responsibility for ensuring records and information are kept, and the systems used to hold them are properly maintained and managed. Different staff have different records and information roles and responsibilities. These roles and responsibilities are detailed below:

Infrastructure & Security Manager is responsible for:

 Management of the records management function.

Ensuring ICT equipment and storage media are disposed of securely ensuring all records, data and information are removed in such a way that it is not recoverable.

Identifying records and information related risks and mitigation measures as part of the disaster recovery plan.

 Information Asset Owners are responsible for:

• Ensuring senior officer(s)/Information champions, are formally designated to take responsibility for the implementation of this policy.

- Assigning responsibilities for records management, retention and disposal.
- Establishing procedures for the management, retention and disposal of records in all media and formats and the system(s) in which records are held.
- Ensuring records due for disposal are properly reviewed, disposal authorised and ensuring disposal is only carried out by authorised staff.
- Records of potential historic interest or research value are identified and transferred with agreement to Gloucestershire County Archive Service.

Information Governance Team are responsible for:

- The ongoing development and maintenance of appropriate classification schemes and records retention schedules in line with appropriate regulations, to make sure the council remains compliant.
- Assisting the development and implementation of corporate records management policies.
- Issuing guidance for implementing and complying with this policy.
- Providing specialist professional advice and support to managers and employees across the Council on standards and best practice in record keeping for both paper and electronic records
- Surveying and analysing current paper and electronic records, filing systems and processes; providing advice on classification schemes linked to record retention, access and security controls applied through the authority's corporate electronic document and records management facilities.
- Promoting good records management practice and adherence through day to day advice
- Overseeing the auditing of compliance with this Records Management Policy and associated policies and standards to ensure statutory obligations are met.

Designated Officers/Information Champions (at Operational Management levels) are responsible for:

- Articulating requirements of this policy in business plans.
- Ensuring records and information management policies are implemented to ensure records and information is managed in line with required standards.
- Providing and maintaining appropriate and adequate record keeping systems.
- Ensuring the development and procurement of ICT systems includes consideration of records management requirements, completing a Data Protection Impact Assessment Form (DPIA) which will help you to identify and minimise the data protection risks of a project.
- Identifying records essential to business continuity and the protection of legal and financial rights.
- Identifying records and information related risks and mitigation measures as part of the risk management process, incorporating this in risk registers and business continuity plans.
- Ensuring services under their control contribute to corporate records and information initiatives and assist the records management function in its duties as required under this policy.
- Records due for disposal are routinely identified and reviewed to ensure they are no longer required and evidence of the disposal process is kept. Staff dispose of records only in

accordance with policies set out in the Council's retention schedules and records are disposed of appropriately considering their sensitivity, security classification and the media and format(s) in which they are held.

- The Information Governance Group is notified of changes affecting records retention and disposal.

All Staff (including temporary staff, contractors and consultants) are responsible for:

- Ensuring records are a complete and accurate record of actions, transactions and decisions.
- Capturing records and required metadata into specified record keeping system(s).
- Not creating and keeping duplicate copies of records and information, and not keeping records in inaccessible private systems (including email boxes).
- Ensuring temporary material is routinely disposed of.
- Following procedures and guidance for managing, retaining and disposing of records.
- Only disposing of records in accordance with records retention and disposal policies contained in the Council's retention schedules (if authorised to do so).
- Ensuring that any proposed divergence from records retention and disposal policies is authorised by the service's IAO.

13. Implementation
13.1 This policy is effective immediately.

14. Monitoring and Review
14.1 Adherence to this policy will be monitored by the Information Governance Team on an annual basis when the Records of Processing Questionnaire is distributed to each Service Area.

15.Useful Contacts
The Gloucestershire Archives Team on archives@gloucestershire.gov.uk or 01452 425294

The Information Commissioner's Office www.ico.org.uk