Definition of a Record: Recorded information (regardless of form or medium) created, received or maintained by the Council in pursuance of its legal obligations or in the transaction of its services.

1. Purpose and Scope of Policy

1.1 We hold records that are a vital asset, support ongoing operations and provide valuable evidence of business activities over time.

1.2 This policy commits us to establish effective records management which will maximise the use of information assets, promote the integrity of our records and ensure compliance with legislation.

1.3 This policy applies to all officers, temporary employees, consultants, contractors, elected members and others in the course of their work for and on behalf of Telford & Wrekin Council whether working directly for the Council or in partnership with it. It applies to all records regardless of format or storage medium, and therefore applies to hand written notes as well as electronic records, including e-mail. This policy applies regardless of location of working environment, be this on Council premises, at home, or elsewhere.

1.4 This policy forms part of the Councils Information Governance Assurance Framework. It is produced in accordance with the requirements outlined in the Lord Chancellor's Code of Practice on the Management of Records, (issued under section 46 of the Freedom of Information Act 2000) and the National Archives Guide 3: Records Management Policy.

2. Roles and Responsibilities

2.1 All employees who create, receive and use records will have records management responsibilities at some level depending on the nature of the role they fulfil. There are 4 main levels of responsibility which are:

- Lead/Strategic responsibility
- Operational responsibility
- Local/Managers responsibility
- Staff responsibility

Detailed below is a summary of each level of responsibility with key tasks bulleted

LEAD/STRATEGIC RESPONSIBILITY: Cabinet Member/SMT/SIRO	◄ Strategic direction ◄ Organisational support and resourcing for RM ◄ Support and enforce RM policy (delegated to Information Governance Team)
OPERATIONAL RESPONSIBILITY: SIRO/Audit & IG Manager	◄ Develop and implement RM policy ◄ Support Service Delivery Units/Team to implement RM ◄ Develop and maintain disposal policy ◄ Provide training where necessary

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	• Carry out regular reviews of RM arrangements
LOCAL/MANAGERS RESPONSIBILITY: Service Delivery Managers / Information Asset Owners	• Ensure RM policy communicated to teams • Implement local/service specific processes to complement RM policy • Staff awareness/training in RM • Action plans in place to meet RM policy requirements and ensure complied with
STAFF RESPONSIBILITY: All employees	• Records are accurate, relevant and not excessive • Comply with local record keeping requirements • Comply with document retention schedules • Commit sufficient time to RM • Accountable for managing records • Records used to meet T&W requirements • Maintain comprehensive and up to date records

3. Record Management Lifecycle (from creation to disposal)

3.1 Record Creation

3.1.1 All employees are responsible for the Council records (digital, electronic and hard copy) that they create/use. The following requirements of record creation must be complied with:

✓ When a record is created it is accurate, current and complete

✓ Records, particularly those including personal identifiable information, must be routinely updated, e.g. changes to name, address, next of kin, GP, etc

✓ Electronic record naming must conform to policy requirements, see Appendix 1 for details

✓ Exceptions in respect to naming records must be justified

✓ Version control is attributed to relevant documents, see Appendix 1 for details

3.2 Record Keeping

3.2.1 Easy retrieval of information is crucial to services operating effectively and is a key building block in records management. The following requirements of record keeping must be complied with:

✓ Records must be organised in clearly named folders/files.

✓ Electronic records must be held within shared drives. This means that information must NOT be saved on the hard drive (c:\ drive), homes drive (h:\drive) or on individuals email accounts

✓ Duplication of records should be avoided at all costs.

✓ Corporate file sharing facilities such as SharePoint, e-team sites, extranet sites, etc, must be used to avoid copies of documentation being emailed across the authority and/or to partners

✓ Records, where possible, must be updated at the time an event has occurred

✓ Records should be accurate and factual. If records contain opinion then the basis for the opinion should be clearly stated. In respect to PII, it should be remembered that an individual has the right under the DPA to see information the Council holds about them

✓ Record keeping should take into account the requirements of the Freedom of Information Act 2000 in respect to individuals having the right to ask for Council information

✓ Where records are held on EDMS (Electronic Document Management Systems) consideration should be given to their legal admissibility

3.3   Record Maintenance

3.3.1   The maintenance of records can cover a multitude of activity including movement of records, storage, contingency, etc. The following requirements of record maintenance must be complied with:

- ✅ Tracker systems implemented to control and log the movement of hard copy records

- ✅ Adequate secure storage arrangements are in place which protects the quality and accessibility of records. Access to records stored must be on a need to know basis

- ✅ Business continuity plans are in place that document the arrangements for the protection of records and detail a 'plan B' if records are unavailable for a prolonged period

- ✅ Adequate back up arrangements are in place to ensure a seamless resumption of service in the event that back up copies of records are required

- ✅ Where records have not been required for live processing for a considerable time (and are still within required retention periods) consideration should be given to archiving them, for hard copy records this would mean transfer to the Councils document retention unit. ICT may need to be consulted for electronic archiving

3.4   Record Access

3.4.1   Council records are accessed for conducting Council business or for legislative reasons (FOI, Data Protection, etc)

The following requirements of record access must be complied with:

- ✅ Access levels to records are reviewed on a regular basis

- ✅ Access is promptly revoked when it is no longer required

- ✅ Access to records is facilitated via a secure method, e.g. electronic records via a userid and password as a minimum, hard copy records access via the use of a key, security pass, etc

- ✅ Right of access requests via FOIA, DPA AND EIR should be channelled through the Information Governance Team

3.5   Record Disclosure

3.5.1   There are a number of legislative provisions that limit or set conditions for the disclosure of information, particularly in respect to personally identifiable information. It is therefore important that consideration is given to whether there is a sound legal basis for disclosing records before they are actually disclosed.

The following requirements of record disclosure must be complied with:

- ✅ The Councils Information Sharing Policy is adhered to

- ✅ Decisions on disclosure of records containing personal information are made by appropriately qualified officers with the Information Asset Owner being aware of the decision making process and/or the actual decision made

- ✅ A record should be maintained of what records have been disclosed, to who, when and on what basis disclosure was made

3.6   Record Closure

3.6.1   The closure of a record and its subsequent treatment needs to be made on a consistent basis.

The following requirements of record closure must be complied with:

- Services should set criteria for when a records status changes from live to closed

- Arrangements are in place to archive records where possible, for hard copy records this means the physical movement of records to the Councils secure storage unit

- If there is further activity in respect to the main subject of the closed record, a decision should be made by a designated officer(s) as to whether the closed record should be reactivated or a new record set up

3.7 Record Disposal/Archiving

3.7.1 The importance of the correct secure disposal/archiving of records cannot be underestimated particularly in regards to personally identifiable information.
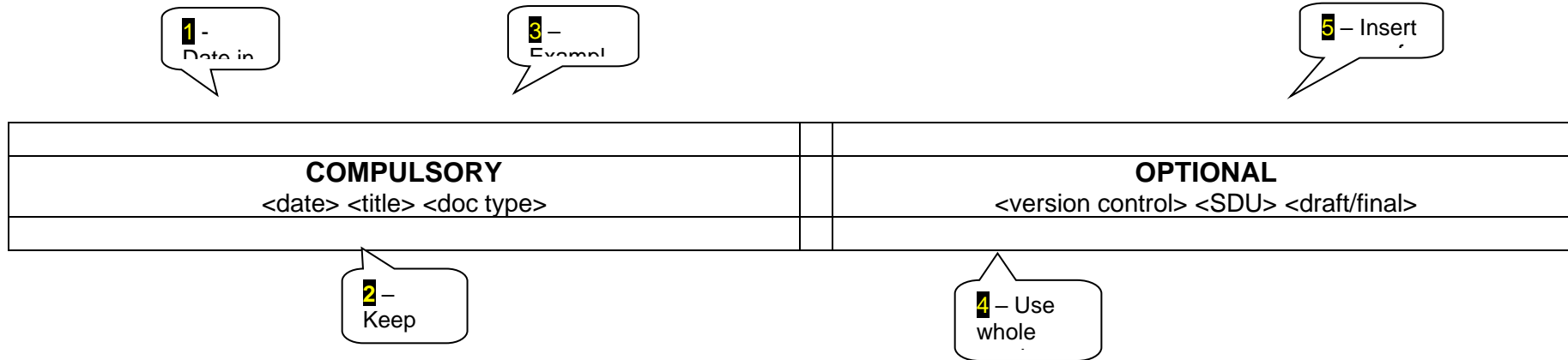
The following requirements of record disposal must be complied with:

- The Corporate Information Retention Schedule is adhered to

- Arrangements are in place to either flag up records that are due for disposal or to instigate a manual review to identify such records

- Disposal is only in a secure manner in compliance with corporate requirements, e.g. hard copies disposed of via Council shredders, electronic records disposed of via ICT

- Accounts (including email boxes and h:\ - homes drive) will be deleted by ICT X months after the employee/holder leaves the Council unless there are extenuating circumstances agreed by the SDM/AD?

- Where records are archived via EDMS (Electronic Document Management Systems) consideration should be given to the legal admissibility of such documents if they were ever required to be used as legal evidence

- Access to archived records should be clearly defined and established on a need to know basis

- Archived records should be reviewed on a periodic basis to establish if these records should be maintained or permanently disposed of.

4. Policy Compliance

4.1 Audit & Information Governance will, as part of its overall corporate compliance programme, initiate a number of records management reviews to ensure compliance with this policy, relevant codes of practice and associated legislation and standards.

4.2 All reviews will be undertaken on a risk basis.

Electronic Document Naming Convention

| 1 -
Date in | | 3 –
Exampl | | 5 – Insert |

COMPULSORY <date> <title> <doc type>		OPTIONAL <version control> <SDU> <draft/final>

| 2 –
Keep | 4 – Use
whole |

Examples:

20140401 Records Management Policy V4.5 IG Final

a co-operative
council

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C O U N C I L