



Renfrewshire Council

Corporate Records Management Policy

October 2015

Document Details

Title	Corporate Records Management Policy
Author	Joseph Bartoletti
Issue Date	October 2015
Subject	Records Management
Description	
Version	3.0
Source	
Updating Frequency	3 yearly review unless required earlier
Right	
Category	
Identifier	

Document History

Version	Date	Author	Reason for Issue / Change
1.0	April 2010	Richard Sharp, Archivist/ Records Manager	To support Corporate Electronic Document and Records Management System
2.0	January 2014		Review of Policy
3.0	October 2014	Joseph Bartoletti, Records Manager	Review of policy for Council's Records Management Plan for the Public Records (Scotland) Act 2011

Related Documents

Ref	Document Name/ Version	Document Location
1	Freedom of Information Policy	Renfo
2	Data Protection Policy	Renfo
3	Information Security Policy	Renfo

Document Review and Approval

Name	Action	Date	Communication
1. Allison Black, Managing Solicitor (Information Governance)		20/10/2015	Email
2. Heather Syme, Solicitor (Information Governance)		20/10/2015	Email
3. Records Management Working Group		21/10/2015	Email

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Introduction

Renfrewshire Council's records are essential for the Council to function and for staff to carry out their jobs. Records provide information for decision making and evidence of the Council's activities.

Glossary of terms

Records are recorded information of any kind and in any form, created or received (captured) by the Council for use in the course of business and subsequently kept as evidence of such business activities.

Records Management is the area of administration concerned with the efficient management of records and information from their creation until their ultimate disposal.

Current Records are those used regularly and frequently in the day to day work of the Council, and generally will be referred to and used at least once a month.

Semi-current Records are those required for the work of the Council, but which will generally be referred to only occasionally, no more frequently than once a month. This category of records also includes those records which, although unlikely to be viewed, are required to be retained for a statutory period.

Non-current Records are records no longer required for the work of the Council.

Archival Records are those identified by the Records Manager, with the assistance of the Records Management Working Group, as having a long-term historical or cultural significance for Renfrewshire or the wider community.

Records Retention Schedules (RRS) are the detailed lists of record types created or captured by the Council over the course of its business activities that show how long each series of records is to be retained and what happens after that period of time is up. The records retention schedules are drawn up by the Records Manager, in consultation with representatives from the Records Management Working Group (see section 2.5).

Disposal is the action that takes place after the prescribed retention schedule has past. In the vast majority of cases it will be 'destroy,' but could also be 'review' and/or 'transfer.'

Scope

This policy applies to all staff and elected members, as they are all involved in the life cycle of records.

Why manage records?

The Council has a statutory requirement to "make proper provision for the preservation and management" of its records; to be publicly accountable for and able to justify its decisions and actions; and to enable compliance with the requirements of the Public Records (Scotland) Act, 2011, the Data Protection Act 1998, the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

The Public Records (Scotland) Act 2011 places an obligation on the Council to prepare and implement a records management plan which sets out efficient arrangements for the management of the Council's records.

An effective records management system is essential to ensure records are created and captured, managed and disposed in an organised manner, maintaining their integrity and authenticity.

Records have to be retrievable - easily and quickly. (Requests for information under Data Protection or Freedom of Information legislation are governed by statutory response times that would be difficult to comply with if relevant information is not easily identified and retrieved quickly).

The purpose of this policy is to manage its records to ensure that the Council:

- Complies with relevant government statutes, regulations, directives, Codes of Practice or other standards;
- Complies with National Archive (UK and National Records of Scotland) guidance to ensure the effective and efficient Life cycle management of Records;
- Creates and captures authentic and reliable records to demonstrate evidence, accountability and information about its decisions and activities;
- Efficiently manages its records to encourage ease of filing and subsequent retrieval, consistency and minimising duplication;
- Facilitates auditing and protects legal and other rights;
- Is aware of the information it holds, its content and its location, thus enabling the timely and accurate response to information requests;
- Maintains records securely and preserves access to them;
- Appropriately disposes of records that are no longer required;
- Protects vital records which it needs in to order to function effectively;
- Maintains records to meet the Council's business needs;
- Complies with records management best practice (see Section 1.4 below);
- Addresses the needs of the Council's stakeholders, including the public;
- Meets and upholds all legislative requirements on the management, protection and security of records;
- Meets its aims and strategic objectives for records management as explained in this policy.

What is records management?

Records management is the adoption of procedures and systems that allow the most efficient control of the information resources of the Council. It is the centralised control and planned disposal of the records generated by the Council. Records management ensures that records are kept only as long as they are needed for commercial, legal or administrative purposes; that records of historical importance are identified; and that records are stored in the most cost effective way.

Although the Records Manager will have a coordinating role in relation to records management, all staff and employees will have individual responsibility for making the system work.

So records management allows:

- Legislative and regulatory compliance;
- Effectiveness in information retrieval;
- Efficiency in record handling and disposal; and
- Economy in office space.

Whilst good records management:

- Provides evidence of the Council's decisions and activities;
- Demonstrates that accountability requirements and statutory obligations have been met;
- Contributes to efficiency and efficacy;
- Minimises risk by ensuring that the right records are created to sustain business performance, and continuity;
- Improves the accessibility of information; and
- Future proofs many aspects of the Council's services.

What is a document and what is a record?

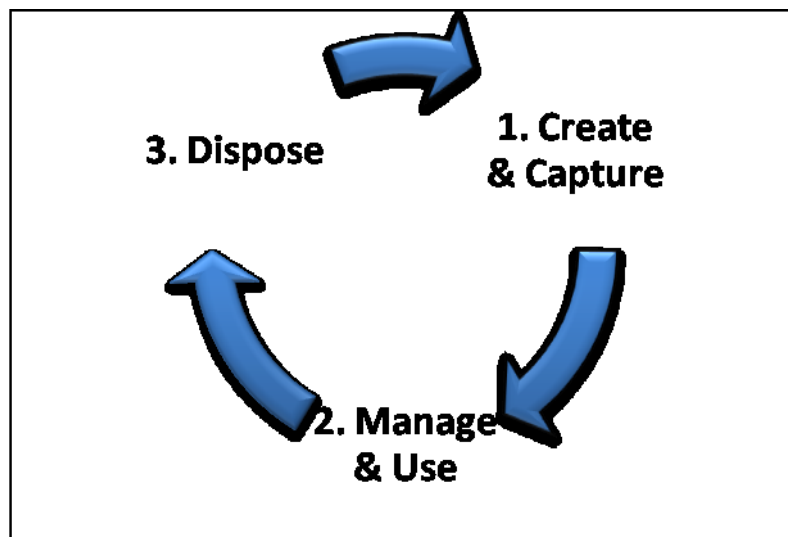
In records management it is important to be clear about the difference between a document and a record.

- A document is any piece of written information in any form, produced or received by an organisation or person. It can include databases, website, e-mail messages, Word and Excel files, letters, and memos. Some of these documents will be of very short-term value and will never become records. That does not mean they should not be managed appropriately and similar consideration must be given to how they are kept, for how long, and what measures are taken after their purpose has concluded.
- Some documents will need to be kept as evidence of business transactions, routine activities or as a result of legal obligations, such as policy documents. These should be placed into an official filing system and at this point, they become official records. In other words, all records may start off as documents, but not all documents will ultimately become records. Thus a record:
 - Can be a single piece of information or a collection of information that is evidence of an activity or decision.
 - Tells the story of how a business area went about an activity or why a particular decision was made.

Records Life Cycle

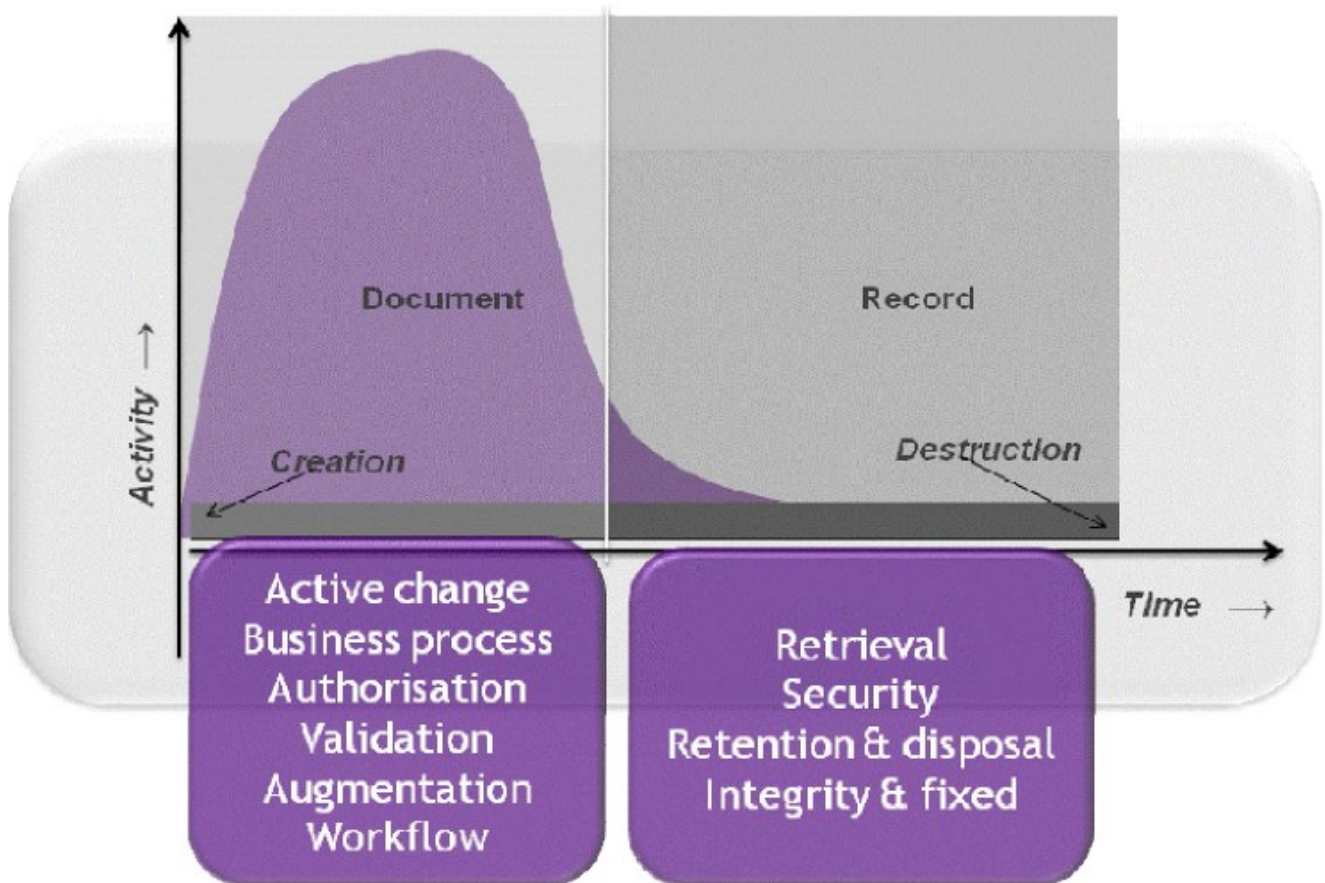
The life cycle of a record consists of just three stages:

- Create and Capture
- Manage and Use
- Dispose



However, depending upon the business activity of the service area, a document may well become a record, for example, a planning application, decision notice, a care plan, or a benefits notification.

The diagram below shows a typical life cycle of a document that becomes a record. A document that will become a record will typically be involved in active change as part of the business process of the service area. Such activity could be centred on the authorisation or validation of, for example, a housing benefit claim. Once the claim has been processed then the service area would make a [business] decision to “promote” the document to a record.



Records Management in Renfrewshire Council

This Records Management Policy applies to both paper and electronic records. Any e-mails which record a business decision or are a record of a transaction may also be treated as records.

Guidance on the handling of e-mails is annexed at Appendix 1.

Roles and Responsibilities

Every employee (irrespective of grade or position) shall ensure that all key documents or records they are responsible for are filed in an appropriate manner. They shall ensure that they know:

- Where the records relating to the business of their team are stored;
- How they are handled / disposed of;
- How long they should be retained for;
- How their records management awareness and skills can be improved;
- What electronic folder set up is used within their team for the sharing of information; and how the information relevant to the official corporate record is identified, printed and added to the paper file.

Employees and Elected Members

All employees and elected members of the Council are responsible for:

- Ensuring that all actions and decisions of the Council are properly recorded and that records relating to their actions and decisions are authentic and reliable;
- Managing records to support the Council's business aims and objectives and not organisational hierarchies;

- Complying with this policy for records management;
- Complying with relevant legislation, policy and corporate guidance on records management.

Elected Members act in three different capacities:

- As members of the Council, e.g. participating in Board meetings;
- As individual Councillors, e.g. constituency work;
- On behalf of their political party, e.g. campaigning.

This policy covers records held by Elected Members in their capacity as members of the Council. Elected Members are individual data controllers of information held for constituency purposes and as such have separate notifications with the Information Commissioner. Information held on behalf of their political party is covered by the parties' notification.

Further guidance on records management will be provided by the Records Manager as required.

Directors

Directors are accountable for:

- Ensuring the records used by employees under their line management are managed in accordance with the Records Management Policy and ensuring that all employees are aware of, receive guidance on and can adhere to this policy;
- Support for records management in terms of resources and commitment;
- Having in place control systems and measures to ensure the proper care and custody of records used under their line management;
- Ensuring that records management is reflected in job descriptions and roles where appropriate;
- Ensuring the general security of records.

Managers

All Managers are responsible for:

- Ensuring the records used or created by employees under their line management are managed in accordance with this policy and associated guidance;
- Ensuring that employees are adequately trained in records management according to their role, and are aware of and can adhere to this Policy and guidance;
- Ensuring that records are kept in a record keeping system with adequate controls and measures and designating employees to administrate the records keeping system;
- With the Records Manager and Information Security Officer, determining the sensitivity of records and defining restrictions on access and extraordinary access;
- Ensuring that, where relevant, records are prepared and archived in line with Council procedures and in the approved place of deposit. The Retention Schedule (see Section 4.) defines which records should be archived and indicates where records need to be considered for archival. Guidance on the archiving of both paper and electronic records is available from the Records Manager;
- The secure and confidential destruction of records, when required by the Retention Schedule, using destruction forms and guidance provided by the Records Manager;
- Ensuring that all partners delivering services to the service area for which they are responsible, have an effective records management policy which meets the requirements of this policy as a minimum, and that responsible employees of the partner are adequately trained to ensure the partner complies with that policy;
- Ensuring that employees are aware of the Council's arrangements regarding access to information and comply with them, and ensure that procedures are in place to document decisions concerning access.

Records Manager

The Records Manager is responsible for:

- Overseeing the compliance of records management practice with this policy, the legislation and professional obligations (as detailed below);
- The completion of a corporate records management plan, in accordance with the Council's responsibilities under the Public Records (Scotland) Act 2011;
- Creating and maintaining guidance, and the provision of advice and support for all records management;
- Access to information arrangements and ensuring that the Council's policies and procedures comply with the requirements of relevant legislation, guidance and codes of practice relating to access to information, inter alia the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004, the Data Protection Act 1998, and records management;
- The provision of training and for raising awareness of records management to employees and elected members;
- Providing guidance on the development of corporate records management tools, and the procedures for their use, including the:
 - Business Classification Scheme and File Plan;
 - Retention and Disposal Schedules, in conjunction with Services; and
 - Corporate File / Record Audit.
- Providing guidance on the development and approval of record keeping systems and records management controls and measures;
- The approval of new technologies that process records;
- The storage of semi-current Records. Approving the adequacy of, including but not restricted to, the environment, physical security and access control, of any designated records stores used by the Council;
- Business continuity arrangements for records;
- Legal admissibility and evidential weight arrangements for records;
- The strategy whereby records that may degrade over time are periodically refreshed, and that any technology needed to retrieve them is both available and current;
- The Council's policy and procedures on archiving historic records
- Providing guidance on the link between the government's information agenda, data protection and freedom of information, and records management practices; and
- The ownership and periodic review of this records management policy.

Records Management Working Group

Each Service and its senior management will retain a service responsibility for ensuring that its records are disposed of at the appropriate time, in accordance with the Council's records retention schedules. All Services are required to nominate at least one departmental officer, of appropriate seniority, and a delegate to supervise this process. These officers will attend quarterly meetings of the Records Management Working Group. The Records Manager will maintain an up-to-date list of members of the Group.

Record Creation and Record Keeping

Business Classification Scheme

The Council is moving away from the concept of personal storage and classification of records according to individual preferences, to a corporate scheme. Individual preferences for the storage of records will not be sustained and all staff must follow the guidance on the corporate scheme.

It is proposed that a corporate Business Classification Scheme (a modified version of the Local Government Classification Scheme) will form the basis for the Council's file plan and will ensure that the context of records are clear within the overall organisational structure and will facilitate searching or browsing of information. The

Council's Business Classification Scheme will reflect a functional approach to files and records management. When this scheme is made available, employees will be expected to use it accordingly and adhere to guidance on its usage.

Record Retention and Disposal

Retention and Disposal Schedules are a vital element of the Council's records management function and necessitated by this policy.

Retention and Disposal Schedules specify the length of time records should be retained for a minimum period. They show where and how records should be disposed of; this does not just have to mean destruction; it may mean reviewing and extending the retention period or archiving the records.

The Council's Retention Schedule is being prepared, using as a model the generic records retention schedule for local authorities produced by the Scottish Council on Archives.

With the public having increasing access to the Council's records, it is important that the disposal of records happens as part of a managed process and is adequately documented. Therefore, the Records Manager will produce guidance on clearly defined arrangements for the appraisal and selection of records for retention and disposal, and for documenting this work. All employees should comply with this guidance.

Records that are subject to current investigation, inspection or an access request under FOI or any other legislation or regulation must not be destroyed. Records for investigations and inspections must be retained until the Records Manager gives approval for destruction. For requests under FOI or other access to information legislation or regulations, approval to destroy the records will be given by the Records Manager.

Retention and Disposal procedures will ensure:

- Appropriate records are reviewed and disposed of, or transferred to the Council's Archive in accordance with the Council's retention schedules and procedures for transfer and destruction;
- Disposal/ transfer of records is complete, secure, where appropriate, confidential, documented, appropriately authorised and auditable;
- Management or appropriate approval is obtained prior to the disposal of any Council records;
- An intended disposal/ review date will be captured when creating electronic records;
- Records subject to a current Freedom of Information request or required as evidence for litigation are not destroyed- this is a criminal offence;
- Records containing personal information are not retained for longer than they should be, in accordance with the fifth principle of the Data Protection Act 1998;
- That the obligations recognised by the Council for the ongoing archiving of relevant documents are met;
- Timely movement of material from expensive office/ on site storage areas to efficient storage areas or for appropriate destruction.

Permanent Preservation for Records of Historical Value

As a Council there is a requirement under the Public Records (Scotland) Act 2011 to retain some records of significant value or interest permanently in archival quality conditions. This will happen once business use has concluded and there are no further business requirements or statutory reasons for the Council to retain the records. Working with representatives of the Records Management Working Group, the Records Manager will ensure that such series of records to be retained permanently are highlighted within the Records Retention Schedules. Any records to be retained permanently, which are not currently in such a series, will be identified on an individual basis.

Council employees must follow the guidance provided by the Records Manager on the selection and management of records when determining whether records are ready for archiving. This includes ensuring appropriate forms are completed and the well-being of the records is maintained at all times, including during transfer to the archives.

Standards and Legislation

Records must be managed in accordance with appropriate standards, legislation and codes of practice. The following is a list of extant legislation, standards and codes of practice:

Key legislation which affects the general management of the Council's records includes:

- Public Records (Scotland) Act 2011;
- The Data Protection Act 1998;
- Freedom of Information (Scotland) Act 2002;
- Local Government Scotland etc. Act 1994, sections 53 & 54;
- Environmental Information (Scotland) Regulations 2004;
- Privacy and Electronic Communications (EC Directive) Regulations 2003.

Key Codes of practice which affect the general management of the Council's records include:

- The Code of Practice as to the keeping, management and destruction of records under the Freedom of Information (Scotland) Act (section 61).

Key Standards which affect the general management of the Council's records include:

- ISO 15489 standard on best practice in records management;
- ISO 176699 standard on information security management;
- BS 10008:2008 (addresses issues around evidential weight and the legal admissibility of electronic information);
- DISC PD 0010:1997- The principles of good practice for information management.

Professional Guidance:

- National Records of Scotland Standards;
- Scottish Council on Archives model records retention schedules for public authorities (2013)

Some Council policies will also affect the management of records and must be complied with. These are referred to in the section Relationship with existing Policies (section 6.1).

Guidance

The Records Manager will provide guidance on the procedures and skills necessary to comply with this policy. This guidance covers a variety of aspects of the Records Life cycle including:

- Records management;
- Records creation;
- Business classification (for filing schemes);
- Retention periods for records;
- Storage options for records;
- Destruction options for records;
- Archival records: selection and management;
- E-mail;
- External codes of practice, standards and relevant legislation.

All employees and elected members have a responsibility to comply with the guidance issued by the Records Manager.

Further Information

Contact:

The Records Manager
First Floor, Renfrewshire House;
(0141) 618 5149

Relationship with existing policies

This policy has been formulated within the context of Council documents including:

- Data Protection Policy;
- Freedom of Information policy;
- Information Security policy;
- Information Management policy.
- ICT Acceptable Use Policy.

Review of Policy

This policy will be reviewed on at least a three yearly basis by the Information Governance team and approved by the Finance and Resources Policy Board. An earlier review will be carried out should any legislative or business change require this.

Appendix 1: Use of e-mails

Within the context of this Records Management Policy, Electronic Mail (e-mail) is considered to be a record or document like any other, and as such will be treated in the same manner and adhering to the same principles as those set out for records of all other formats, or documents (information) as appropriate.

Furthermore e-mail correspondence may form part of a record or evidence trail in the same way that paper correspondence does. The e-mail format is not significant with respect to records.

The following general principles will apply to e-mail retention and management.

- E-mails required as evidence of business activity or which in any other way constitute a record, should be transferred to an appropriate record keeping system and are subject to the Council's Retention schedule like any other format of record;
- Junk e-mails should be deleted as soon as possible;
- E-mails that have information content only, and are not required as records, should be deleted as soon as the information is no longer required. If the information content is substantial, such as in an attached document, it should be stored in an appropriate document storage area, not retained in the e-mail;
- E-mail boxes are subject to management constraints, such as, for example, on size or length of retention, upon which guidance will be issued from time to time.

All employees and elected members have a responsibility to manage the e-mails they create, or which they receive as a primary recipient, as records or documents, and to comply with the policies and guidance issued by the Corporate Records Manager for both.

All employees, elected members and partners have a responsibility to ensure that the way in which they use e-mail is safe, secure and complies with legislation. In the interests of information security, they are also obliged to only use the secure system provided by the Council appropriately. The rules on appropriate use are contained in the Council's ICT Acceptable Use Policy.