Information and Records Management Policy

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1. Introduction

This policy provides Somerset West and Taunton Council with a framework for managing records and information. Records and information are currently created in both digital and physical format and they should be managed extremely carefully. Records are assets which belong to the council to provide transparency, accountability, business insights and improved service delivery. This policy will help us all to manage our records and information efficiently, compliantly, and effectively.

1.1 Policy Statement:

Records and information are very important assets which belong to Somerset West and Taunton Council, not individuals.

2. What are the aims of this Policy?

This policy is designed to clearly communicate the importance, responsibilities, and obligations to Somerset West and Taunton Council employees for excellent records management. Currently records are created and managed in a hybrid format (both digital and physical). This policy will also provide a clear direction for digital records being recognised as the official record. The public have an increasing expectancy to be communicated with online. Therefore, this policy will communicate the shift from paper records to digital creation.

2.1 Policy Statement:

The official record recognised by Somerset West and Taunton Council will be in digital format in most cases. There will be a need to maintain a small number of records in physical format.

3. What is Records Management?

Records Management is also sometimes referred to as Information Management. The ISO 15489-1:2016 defines records as

"*Records* as "information created, received, and maintained as evidence and as an asset by an organisation or person, in pursuit of legal obligations or in the transaction of business".

The Records and Information we create should be:

- Authentic
- Complete
- Reliable
- Accurate
- Timely

There are 2 models for managing records and it is essential that we manage our records carefully as they are as important as employees and financial assets. We rely on them for transparency, accountability, service delivery and compliance.

3.1 Lifecycle Model

The lifecycle model consists of 5 stages: creation or receipt, classify, use and management, appraisal, disposition, or digital preservation.
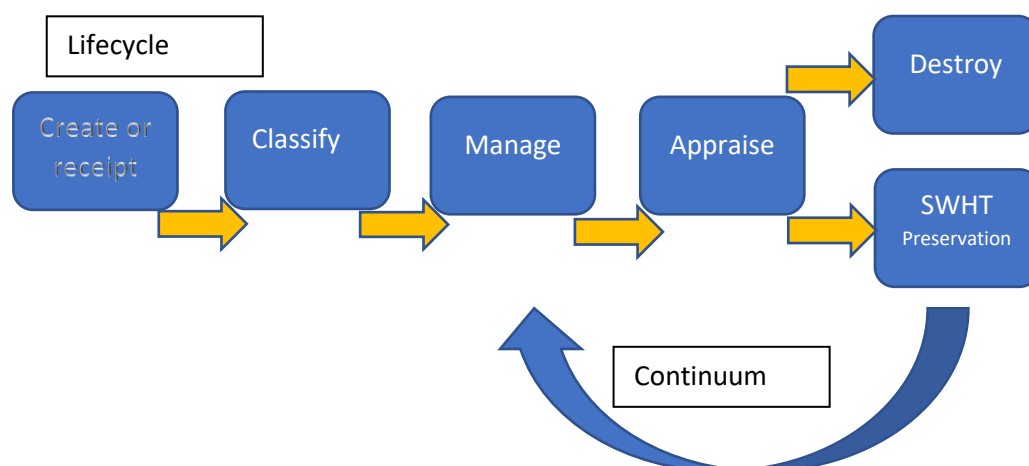
3.2 Continuum Model

The Continuum Model intrinsically links digital preservation with the current records we manage within the council. This approach accepts that records that may have been archived could, essentially become active again if required for evidence or transactional purposes.

Somerset West and Taunton Council has an established relationship with the South West Heritage Trust (SWHT), so this model is the most effective in managing active and archived records together for evidence and transparency. This council has a public duty to transfer approximately 5% of its records for permanent preservation to the SWHT under The Public Records Act 1958

3.3 Policy Statement:

Records must be reliable. Somerset West and Taunton Council will use the Continuum Model for managing records to provide business continuity to the organisation. Everyone must create and manage their records to the standard set out within this Policy.

4. Why is Records Management so important?
4.1 Corporate

The council is dependent on the records and information we create to deliver effective and efficient services. We need to manage our records efficiently and cost effectively to ensure that legal, operational and information requirements are met. Failure to manage our information and records properly is a significant risk as we are publicly accountable and need to demonstrate transparency to ensure that we comply with the public accessibility legislation.

Information and records provide our cultural and archival heritage for the community we serve, corporate memory. They also provide evidence of our transactions and decisions. They are a vital asset which are required for daily operations, including compliance with legal and regulatory requirements. They support:

- Strategy and policy formulation
- Decision-making
- Protect the interests of the council as a corporate body
- Protect the rights of employees, the public and service providers
- Help the council to deliver services in accountable, consistent, and equitable ways
- Help the council to make good use of precedents and organisational experience
- Support consistency, creativity, efficiency, and productivity
- Professional accreditations

4.2 Policy Statement:
Records Management must be recognised an essential function by everyone who works for and with Somerset West and Taunton Council.

4.3 Compliance with the law
Somerset West and Taunton Council is a public authority and is subject to public accessibility legislation.

In addition to this, Somerset West and Taunton Council must comply with lots of other legislation, regulations and best practice known as 'the wider legal framework'. Some of these will be very specific to services, such as Financial Regulations. However, some of the Wider Legal Framework affects everyone and we should all be aware of them. They are as follows:

Public Accessibility Legislation

- Freedom of Information Act 2000
- The Data Protection Act 2018
- Environmental Information Regulations 2004
- UK General Data Protection Regulations (GDPR)

Wider Legal Framework and Best Practice

- The Public Records Act 1958 & 1967
- The Human Rights Act 1990
- Copyright, Designs and Patents Act 1998
- Communications Act 2003
- Lord Chancellor's Code of Practice on the Management of Records under Section 46 (part 1 section 7), the Freedom of Information Act 2000
- Cabinet Office Security Policy Framework
- Government Security Classifications Policy (GSCP)
- ISO:15489

4.4 Policy Statement:
Somerset West and Taunton Council is compliant with the Wider Legal Framework, Public Accessibility Legislation and is an exemplar of excellent Records Management practice and processes. The Information Management Team will run regular reports to monitor and action non-compliance.

5. Somerset West and Taunton Council Records and Information Management Principles

These principles are agreed by Information Management. They support the shift from paper records management to digital by default.

5.1 The Key Records Management Principles:

1. **Records Management will be easy.** There will be 7 clear repositories for employees to store their records and information.

    a. My Information (information relating to your employment for example such as personal development plans, one to one notes, courses attended etc.)
    b. Team Information (for organisational team information such as team minutes, rotas, Team Learning etc.)
    c. Business (full EDRMS – Electronic Document and Records Management System, based on the Corporate File Plan) **for all core business information**
    d. Project (for approved project or programme work with a defined business outcomes and benefits)
    e. Large Data Storage Area (for large data files such as GIS or AutoCAD). Transition Drive.
    f. Line of Business Systems (systems specific to service areas or departments)
    g. Records Stores (for physical records)

2. **Records Management will be modernised by creating and receiving in a digital format, wherever possible.** This will be achieved by transforming the current culture (creating records in both digital and paper) as part of a Records Management Transformation Programme. Post will be received and sent in digital format.

3. **Information should be open (read only) to the organisation** unless there are business or legislative reasons why it should not be. (For example, personal, special category data or business confidentiality). This ensures that that the value of data is exploited, personal data is safeguarded and compliance to public accessibility legislation requests are met.

4. **Information created, received, and held within Somerset West and Taunton Council belongs to the Council.** It is a corporate asset, as important as people,

money, and property. It is imperative to communicate this principle to all employees through a project communication plan. Data does not belong to individuals and this Council is required to provide transparency and accountability to the public it serves.

5. **Security, access to information and permissions will to be clear and simple.** Permissions will be controlled by ICT through Active Directory via functional groups. The starter/leaver/changes process and HR system are **an intrinsic prerequisite** to this principle.

6. **Less is more.** Continuous Identification and removal of duplicated, obsolete and data past its retention will ensure that data integrity will remain consistent and provides a resilient foundation for decision making and transparency.

7. **Clear, simple, innovative communication** is imperative to ensure that employees understand this policy and their responsibilities. This is outlined in our strategy.

8. **Data held within the line of business systems will be included within the Retention and Disposal Schedule.** Structured data classified in bespoke systems is subject to DPA, FOI, EIR and the wider legal framework in the same way that unstructured data is drives is.

5.2 Policy Statement:
Somerset West and Taunton Council employees, suppliers, and partners should know, understand, and abide with the Records Management Principles

6. Your Roles and Responsibilities
Somerset West and Taunton Council has a corporate responsibility for ensuring that records and information are managed effectively and the systems that we use are properly maintained and managed. Although we are ALL responsible for managing our records in accordance with this policy, there are certain roles specific to different individuals and groups. They are as follows:

6.1 Information Management Team
- Management of the Records Management Function
- Custodian and creator of all Information Governance policies, procedures, and best practice
- Ensuring that the policy framework is kept up to date and relevant
- Monitoring records management practice within the council
- Communication and training
- Subject matter expertise
- Implementation of 'Paper to Digital' Strategic Direction
- Custodian of Corporate File Plan and Information Asset Registers
- Assisting with compliance audits, both internally and externally
- Ensuring retention and disposal rules are carried out

- DPIA (Data Protection Impact Assessments)
- Data Sharing Agreements
- Ensuring the development and procurement of ICT systems includes the consideration of records management requirements

6.2 ICT
- Custodian of and creator of all ICT Information Policies
- Management and security of all systems
- Back up and disaster recovery for all records and information held within council systems
- Systems Integration

6.3 Employees
- Store information in the correct locations
- Add PII classification to every document
- Manual deletion where applicable
- Regularly liaise with Information Management Team to dispose of physical records on an annual basis

6.4 Policy Statement:
Everyone within the council has a responsibility to create, manage, destroy, or keep records in accordance with this policy and the law. This will be included in staff inductions.

7. Retention and Disposal Schedule
A Records Retention and Disposal schedule is a policy that defines how we manage our physical and digital records and information. It provides us with clear guidance on how long we should keep it and when we should delete or dispose of it. This is a living document, and it will be consistently changed to reflect changes in legislation and business requirements. The Corporate FilePlan built in SharePoint Online displays the visual script of the retention and disposal schedule at transaction level.

7.1 Why is it important?
Somerset West and Taunton Council is a public authority. This means that we are subject to public accessibility legislation. The Freedom of Information Act 2000, The Data Protection Act 2018 and Environmental Information Regulations 2004. This provides the public with the right to access some records and information that we create (unless exemptions apply).

In addition to this, the General Data Protection Regulations, which updated the Data Protection Act 2018 brought new requirements as follows:

- It states that 'personal information must not be kept for longer than necessary'.
- A lawful basis for processing must be applied to all personal information we process.

- We are monitored by the Information Commissioners Office who could issue us with enforcement notices or fines of up to £17 million or 4% of our annual turnover if we are not compliant.
- We are ALL now responsible for processing personal data.

7.2 Policy Statement:

Everyone within the council must support the development of the new Retention and Disposal Schedule to meet legislative requirements and business needs.

All records either digital, physical or email will be subject to the Retention and Disposal Schedule.

8. What is Personal Identifiable Information (PII)?

There are 2 classifications for personal identifiable information. These are personal and special category data. We are required to identify personal data and apply the lawful basis for processing it. This is included within the updated Retention and Disposal Policy. It will also be a mandatory field that you will need to complete in a corporate records management system.

8.1 Personal

This is specific information that relates to an identified or identifiable individual. What identifies an individual could be as simple as:
- a name
- a phone number
- an identification number, for example your National Insurance or passport number
- your location data, for example your home address or mobile phone GPS data
- an online identifier, for example your IP or email address

8.2 Special Category Data

Special category data used to be referred to as personal sensitive. This is information, which if not used appropriately, could cause personal distress or harm. You must manage this information with extra care. The type of records which as classed as special category data are as follows:

- personal data revealing racial or ethnic origin
- personal data revealing political opinions
- personal data revealing religious or philosophical beliefs
- personal data revealing trade union membership
- genetic data
- biometric data (where used for identification purposes)
- data concerning health
- data concerning a person's sex life; and
- data concerning a person's sexual orientation.

8.3 Policy Statement:

Everyone within the council has a responsibility for processing personal or special category data. It is a manager's responsibility to ensure that their employees attend E-Learning training on public accessibility legislation. Everyone should be aware of their responsibilities when processing personal data.

9. Records Classification and File Plan

Classification (categorisation) of information is exceptionally important as is supports finding, processing, using, analysing, and preserving information quickly and easily. Finding information is extremely important for compliance with access to information requests.

9.1 The Local Government Functional Classification Scheme

The Local Government Functional Classification Scheme (LGFCS) provides a nationally approved framework which can be used to create a new functional corporate file plan. This model provides integrity and resilience for any council as it stands the test of organisational change. It provides a strong foundation and information architecture and is based on the functions, activities, and transactions we all conduct for the purposes of our daily work.

9.2 The Benefits of a Functional Classification

Somerset West and Taunton Council is continuously evolving and re-organising to align our services to increased public demand. However, the functions we deliver do not change very much. Most importantly, functions make sense to the public. Councils consist of many different functions, rather like different businesses operating within one organisation. So, for example, Information Governance is a completely different function (business area) to Procurement. It is very important to deliver a functional classification as opposed to an organisational one. The rationale is as follows:

- The functions of a council are easier for the public to understand
- The LGFCS provides a nationally approved framework as a basis for a file plan
- The functions of a council do not change often but the organisational structure is consistently changing
- The legislation matches the classification perfectly and provides the foundation for Information Asset Registers and the updated Retention and Disposal Schedule
- It can provide the basis for simplified permissions and access models for the council's corporate information assets

9.3 The Somerset West and Taunton Council File Plan

This policy advocates a new comprehensive file plan and structure for managing and organising your records, information, and emails. The new File Plan based on functional classification is embedded in the new EDRMS SharePoint.

The file plan is embedded with automated Retention and Disposal rules to simplify records management for everyone. It will also help you to organise both physical and digital records once they have been created. This file plan will support everyone within the organisation in managing record disposition. This is determined in The Lord Chancellor's Code of Practice on the Management of Records, S46 (12) of the Freedom of Information Act 2000.

9.4 Policy Statement:

Somerset West and Taunton have adopted a functional file plan based on the LGFCS (Local Government Functional Classification Scheme) framework.

10. What is Security Classification?

Security classification is a methodology which groups information and systems. Records and information are grouped so that the same controls around the protection and handling of the information assets can be applied to items with the same classification.

Most typically security classifications relate to the impact of a loss of confidential information.

10.1 The Government Security Classifications Policy (GSCP)

The Government Security Classifications Policy (GSCP) is a system for classifying sensitive government data in the United Kingdom. Historically, the Government Protective Marking Scheme was used by government bodies in the UK; it divides data into the following groups:

- **UNCLASSIFIED**
- **PROTECT**
- **RESTRICTED**
- **CONFIDENTIAL**
- **SECRET**
- **TOP SECRET**

The GSCP was implemented in 2014 and describes how HM Government classifies information assets to ensure they are appropriately protected. It applies to all information that government collects, stores, processes, generates, or shares to deliver services and conduct business.

10.2 Somerset West and Taunton Council Security Classification Policy

Local Government tends to utilise 3 classifications for security. This also intrinsically links the processing of personal data with these security classifications. They are as follows:

- **NO - (no personal data)**
- **YES - (commercially sensitive or personal data)**
- **SPECIAL CATEGORY – (special category data)**

10.3 Systems Security Classification
Most line of business systems will have security classification embedded. The new Corporate Records Management System will have the ability to tag records and documents with the security classification and/or personal data.

10.4 Policy Statement
Somerset West and Taunton Council will adopt the following security classification policy:

- **NO - (no personal data)**
- **YES - (commercially sensitive or personal data)**
- **SPECIAL CATEGORY – (special category data)**

Security classifications will be added in the future.

11. Naming our Records
Naming conventions are a standard set of rules which must be applied to our records, files, and folders. A consistent approach improves search and information integrity. Standard naming conventions must be used in the new SharePoint File Plan. The naming conventions are as follows:

- Start the document with a 6-digit date in reverse order. This ensures that records are stored in date order. YYMMDD e.g., 210116
- Ensure your document is named in a descriptive and clearly identifiable way e.g., Digital Service Annual Report
- Consistent for all employees
- Abbreviations, symbols, or acronyms should not be used as they are meaningless to others

11.1 Policy Statement:
Somerset West and Taunton Council will use a consistent naming convention for all records in both physical and digital format. The naming convention also applies to email storage within systems.

12. Information Asset Registers (IARs)
Somerset West and Taunton Council holds Information Asset Register for all records and information created and managed in the organisation. It includes the location of assets, retention periods, information asset owners, security, and location.

12.1   Policy Statement:
Information Asset Registers and Information Asset Owners must be updated on an annual basis. The Information Governance Unit are custodians of all Information Asset Registers.

13. Data Protection Impact Assessments (DPIA)

DPIA's are required by the council to minimise data protection risks of a project or procurement. They are essential for new technology that we procure or implement as we need to assess what data will be processed. It is essential that we assess the following:

- Identification and assessment of risks to individuals
- Measures to mitigate risk of data breach
- Purposes for processing the data
- Compliance measures

The Information Governance Unit can provide guidance and support for creating DPIA.

13.1 Policy Statement:

Data Protection Impact Assessments must be completed for all major projects and new technology implementations.

14. Data Sharing Agreements

Somerset West and Taunton Council is reliant on working with partners to deliver shared services to the public we serve. We must complete Data Sharing Agreements with our partnerships to share data for the benefit of our customers. Somerset West and Taunton Councils Data Sharing Agreements are completed by the Information Management Team and ICT. The Data Sharing Agreements include the following information:

- The partnership roles and responsibilities
- The purpose of the data sharing
- The data sharing process and ownership
- Standards

14.1 Policy Statement:

Data Sharing Agreement MUST be completed for sharing any data/records/information with any external body. The Information Management Team are the custodians of Data Sharing Agreements.

15. Paper Records

Paper records are stored in a variety of locations across the Council. This policy's aim is to rationalise and classify the paper estate. Retention and disposal need to be applied on an annual basis to all paper records. A new central index will be available to all employees via SharePoint Online. It is everyone's responsibility to ensure that their physical records are managed and disposed of in accordance with the legislative compliance.

15.1 Policy Statement:
It is everyone's responsibility to ensure that their physical records are managed and disposed of in accordance with the legislative compliance.

16. Access and Permissions

This policy advocates an open culture in access to information and records, whether appropriate. Accessibility to our core records supports business continuity and effective collaboration. However, there are groups of data and records which will need to be restricted. Restricted access applies to both digital and physical records. The categories which can be **open, read only to everyone,** are as follows:

- records which do not contain personal or special category information
- records which do not contain commercially sensitive information

All other records will be controlled by Information Management and ICT through a simplified permissions model or physical storage with the appropriate access security.

16.1 Policy Statement:
Records need to be accessible for business continuity and collaboration, unless they contain information which needs to be restricted. Appropriate security controls are applied to both physical and digital records.

17. Email Records Management

Emails are core corporate records and should be managed in the same way as all other records within the council. Emails, in many cases, have replaced former physical letters and they should be stored alongside all other records. Storage in individuals Outlook folders is a risk to the organisation as they are inaccessible and could contain vital information for business decisions or continuity. They may also contain personal data, which if not managed compliantly, could contravene the DPA 2018 (Information must not be held unfairly, unlawfully, or excessively).

Emails will be managed through policy as follows, from 17th September 2021:

- Inbox – 1 Year
- Drafts – 1 Year
- Deleted – 1 Year
- Sent – 1 Year
- Calendar – 1 Year
- Tasks – None
- Shared Mailboxes – None
- PST Files/U Drive Archives – 6 months from Sep 2021, Deleted March 2022

The 1-year retention on mailboxes will be reviewed down the line, with a view to reduce this to 6 months. This is the standard for emails.
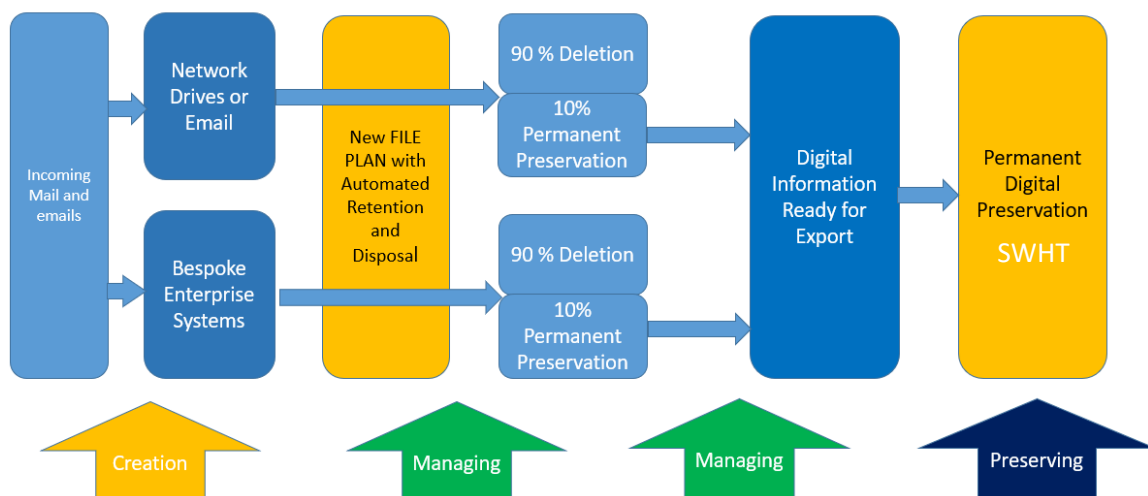
17.1 Policy Statement:

Emails are core records and must be managed compliantly and stored in core systems and not outlook folders. Retention and Disposal Rules apply to emails.

- **Inbox – 1 Year**
- **Drafts – 1 Year**
- **Deleted – 1 Year**
- **Sent – 1 Year**
- **Calendar – 1 Year**
- **Tasks – None**
- **Shared Mailboxes – None**
- **PST Files/U Drive Archives – 6 months from Sep 2021, Deleted March 2022**

18. Digital Preservation

Every public body is required to transfer approximately 5% of records to their local records centre. This is legal requirement under the Public Records Act. The South West Heritage Trust (SWHT) preserves social and corporate memory for historical and archival purposes. All records assigned for permanent preservation must be transferable in all formats. This policy mandates the transfer of digital and physical records.

Overtype with SWHT (image above)

18.1 Policy Statement:

Somerset West and Taunton Council will comply with the Public Records Act and transfer records identified for permanent preservation. This will apply to records in all formats, both digital and physical.

19. Legislation and Best Practice

Legislation we must comply with:

- [The Data Protection Act 2018](#)
- [The Freedom of Information Act 2000](#)
- [Environmental Information Regulations 2004](#)
- [UK General Data Protection Regulations (GDPR)](#)
- [The Public Records Act 1958 & 1967](#)
- [The Disposal of Documents Order (No.167) 1925](#)

Best Practice Guidance to support this policy:

- [Lord Chancellor's Code of Practice on the Management of Records under Section 46 (part 1 section 7), the Freedom of Information Act 2000](#)
- ISO15489 (International standard for the management of records)
- [IRMS (Information and Records Management Society)](#)
- [TNA (The National Archives)](#)

Approval	Name	Date
Director of Internal Operations	Alison North	26.05.22
Information and Records Manager	Lauren Davis	24.05.22
Senior Management Team	CEO/Directors	01.06.22
Executive		