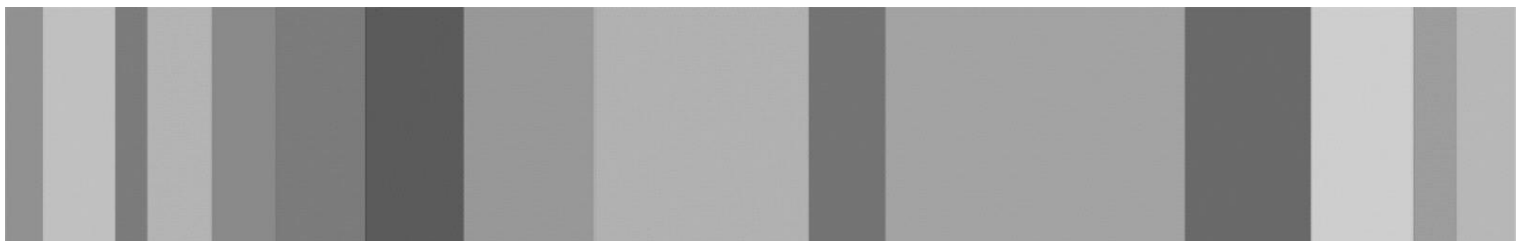


Bolton Council

Corporate Records Management Policy



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Version control

Version	Author of Changes	Date	Summary of changes made	Approved by (meeting / committee)
1.0 draft	D Bridge	23 July 2019	Draft Policy	
1.1	P. Ashcroft	July 2022	Updated to reflect current practices	

INTRODUCTION

1. *Improvements in IT and our understanding of Information Risk Management has made Records Management an issue...Records Management is best approached as in integrated risk management issue (Deloitte & Touche 2008).*
2. This policy applies to records generated in any format (for example paper, tape, electronic) from receipt to destruction, a record's entire lifecycle.
3. This policy is produced in accordance with the requirements defined in the Lord Chancellors Code of Practice on the Management of Records (issued under s46 of the Freedom of Information Act 2000) and ISO 15489 Standard for Records. This policy is produced in consultation with the Data Protection Officer and Information Governance team.

Purpose

4. This policy is designed to provide guidance for all staff members who create, use or manage corporate information.
5. Bolton Council records are a vital part of its corporate memory providing support for ongoing operations and provide evidential integrity of information, where required. Records are an important corporate asset and should be managed effectively like any corporate asset. The council recognises that effective management of its records:
 - supports council core functions
 - aids compliance with legal and regulatory requirements
 - Ensures that officers have the right information, in the right time, in the right place; ensuring that the council is responsive to client's, partner organisation's and colleague's needs
 - Ensures that Redundant Obsolete Information (Information ROT) is not a corporate issue
6. The purpose of this policy is to define the principles behind record keeping so that:
 - Information is obtained fairly and lawfully
 - Information is accurate, authentic and accessible (for corporate legal or historical purposes)
 - Information is retained for only as long as necessary
 - Information deemed suitable for Article 89 preservation is retained appropriately
 - Ephemeral records are routinely and appropriately disposed.
7. Appropriate, efficient and effective records management should be an integral part of routine business purposes.
8. Not all information is a record or needs saving but it all needs disposing of appropriately.

9. Roles and Responsibilities

Senior Information Risk Owner (SIRO)

- Strategic management of the corporate information and records management function;
- Strategic management of corporate information risk and governance;

Data Protection Officer

- Providing advice and assistance relating to Data Protection, Privacy, Information Governance and Records Management

- Monitoring Compliance with data protection, information & records management, information governance and awareness raising requirements
- Provide advice and guidance on Record of Processing format and contents
- Documenting and authorising retention schedule divergence
- Confirming records deemed suitable for Historical Preservation
- Reviewing data sharing agreements, data protection impact assessments and record keeping requirements

Departmental SIROs

- Strategic management of departmental information and records management
- Ensuring that staff are aware of policies to retain and dispose of records and only dispose of records in accordance with the Council's retention schedule
- Supervision of departmental information risk and governance
- Overview of departmental information law training
- Overview of DPIA and DSA and record keeping of their documentation

Information Governance Steering Group comprised of SIRO, DSIROS, DPO and IG Manager

- Assess statistics for Information law compliance e.g. FOI and EIR requests; subject access requests and other rights
- Oversee the management of information and records management
- Oversee Information Risk and Governance
- Overview of information law training

Information Governance Working Group

- To support Information Governance activities across the Council as requested by the strategic Information Governance Steering Group. (IGSG)
- To escalate and inform the IGSG of progress relating to IG projects as well as suggesting improvements and mitigations to reduce risk

Head of Information Governance

- Operational management of information governance
- Strategic management of the Record of Processing Activity

Information Asset Owner

- Maintaining and updating of the Record of Processing Activity for information assets in their area
- Establishing procedures for the management and disposal of records [in all formats and media]
- Confirming retention periods and authority with the Data Protection Officer
- Ensuring divergence from corporate retention policy is authorised
- Implementing information and records management policies in their business area
- Providing and maintaining appropriate record keeping systems
- Ensuring that records are disposed of appropriately
- Identifying records of potential historical interest and pass them for review by the Data Protection Officer and The Council Archivist.

Team Leaders, Managers

- Ensuring record keeping systems and records are managed to enable identification of records due for disposal
- Keeping records of information and records disposed of by their area
- Regularly identifying and reviewing records due for disposal [to ensure they are no longer required]
- Ensuring that staff are aware of policies to retain and dispose of records and only dispose of records in accordance with the Council's retention schedule
- Ensuring that records are disposed of appropriately

All Staff (including Temporary Staff, Contractors and Consultants)

- Following procedures for managing retaining and disposing of records
- Ensuring records are only disposed of in accordance with Corporate Policies

Contracts and Contractors

- Contracts and agreements should 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 others
- Records are created or received and held as part of collaborative working.

10. What training will staff need to support them?

The Data Protection Officer and Head of Information Governance require the necessary training (or experience) required to offer advice and guidance on corporate record keeping and retention across all levels of the organisation, from executive to front line staff. Ideally one or the other should be a member of an appropriate professional body, for example ARA (Archives or Records Association) or IRMS (Information & Records Management Society).

DSIRO's, Senior Managers and IAOs should be mandated to complete higher-level Data Protection and IAO training

All staff should complete an appropriate level of data protection training and be made aware of this and complimentary policies.

11. Implementation and review

This policy is intended to form the framework for the development of modern, pro-active records management which may be reviewed against national standards and guidelines such as s46 CoP FOI. Other key performance indicators should be a reduction in unstructured information and an increase in disposal of corporate records.

This policy will be reviewed by the Data Protection Officer and reported to the Information Governance Steering Group, when required and in any event every three years.

Definitions

Archival Records	Records no longer required for business or operational reasons which have been identified as having a long-term public interest, scientific, historical research or statistical purposes (Article 89 UK GDPR) may be archived i.e. kept for long term preservation. These may be stored by the council archive service or retained by the service.
Article 89 (of UK GDPR)	Subject to safeguards records which may be retained indefinitely for scientific, historical research, statistical purposes. See also Part 6 DPA.
Corporate Record	“information created, received and maintained as evidence by an organisation or person in pursuance of legal obligations or transaction of business. Records must be authentic, reliable, usable and capable of supporting business functions....” ISO 15489
The council	Bolton Council
Current Record (sometimes known as Active)	Records used frequently in the day to day business of the council.
Data Protection Officer	A statutory role providing independent guidance and advice on obligations relating to data protection and privacy.
DSIRO	Departmental Senior Risk Owner responsible for the strategic management of information assets.
Disposal	Records which have reached their retention date and no longer have a corporate use. Records may either be transferred to the Council Archive Service or appropriately destroyed.
Ephemeral Data	Information only required temporarily which will not form part of a corporate record e.g. a contact list required to complete a task.
Historic or permanent preservation (see also Article 89 UK GDPR)	Records which may be deemed to be of public interest, scientific or historical [or potential historical] interest. May be held permanently (subject to safeguards). This applies to records in any format. The IAO should confirm this classification of information assets in their area with the DPO.
Information Asset	A body of information which may be defined and managed as a single unit. An information asset has meaning, context and value.

Information Asset Owner	A manager responsible for the operational management of information assets. They should understand what information they hold, why, the risks and the public benefit in holding them and how long they should be retained.
Information Governance	Provides guidance on the balance of using information with security.
Information Governance Manager	Manages the information governance service.
Information ROT	Keeping Redundant, Obsolete or Trivial information creates many corporate concerns
Legislation	
DPA	Data Protection Act 2018
EIR	Environment Information Regulations 2004
FOIA	Freedom of Information Act 2000
FOIA Section 46 CoP	Code of Practice issued by the Lord Chancellor which provides guidance on the key elements of managing information and records.
UK GDPR	UK General Data Protection Regulation
Public Interest	Issues of common concern about the management of public affairs (not curiosity).
Records Management	The field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records. Based on the principles of regular review and controlled retention or destruction with the general aim of ensuring cost-effective business processes, legal and regulatory compliance and corporate accountability.
Record of Processing Activity	Article 30 UKGDPR requires that an organisation maintains a record of processing activities under its responsibilities; this is a key part of the “accountability principle”. Maintaining a record of what activities require the use of personal data helps to ensure and documents, compliance with GDPR.
Retention Schedule	Identifies classes of records held by the authority. The schedule will contain the following information: record type; retention trigger; retention period; action at the end of retention; authority for retention. A simplified schedule will be published to enable Information Asset Owners to identify a suitable retention date on the creation or

	closure of a record. Queries on retention dates will be addressed by the Data Protection Officer. Maintaining a retention schedule is a statutory requirement under UK GDPR.
Semi current record (or semi active)	Records which must be retained for corporate or legal purposes but are no longer required on a frequent basis.
Unstructured Records	Information or data held by the council which is not classified or catalogued and is not easily searchable.
Vital Records	Records the council cannot function without.