Records Management Policy

Version 2.1, June 2024

Revision history

Date	Version	Summary of action	Author
June 2012	0.1	The requirement to replace the 'Records and Information Governance Strategy 2006-2009' and meet the need of the Information Governance Framework.	Jeremy Tuck
June 2012 – October 2015	0.2 – 0.7	Updates/review before final sign off by CGG	Jeremy Tuck Leila Ridley
November 2015	1.0	Approved by CGG	Leila Ridley
March 2018 – January 2023	1.1 – 1.4	Updates/annual review	Leila Ridley Lisa Ford
February 2024	2.0	Updated as part of policy framework review	Lisa Essoo
June 2024	2.1	Amendment to classification/sensitivity labels	Lisa Essoo

1. Purpose of this document

This document sets out the policy for records management standards and forms part of the Information Governance Policy Framework and should be read in conjunction with the Data Protection and Access to Information policies.

This policy is applicable to council employees, councillors, temporary and agency staff and contractors working for and on behalf of the council and any organisations processing data on the council's behalf.

2. Introduction

Any evidence of council business activity is a record. Records, therefore, can be paper documents, electronic files, emails, databases, maps, or images.

Records are the council's corporate memory and provide the evidence of the council's business actions and decisions. They also provide evidence that the council has satisfied statutory requirements. Well managed records can improve the process of decision-making and facilitate business administration. They are, therefore, a corporate asset.

A record is a piece of information that has an intrinsic worth, which makes it important enough to save and keep secure for its evidential value. To decide whether a piece of information is a record or not, its business context must be understood as well as its relevance and significance to the organisation (MoReq2010).

If a record is of value as evidence of business activity, it is important that it is managed in a way that ensures the record:

- Can be easily and quickly retrieved.
- Is authentic – it is what it purports to be.
- Is reliable – information in the record is accurate and can be depended on.
- Has integrity – it is complete and unaltered.
- Has appropriate context information about where it was used.
- Has structure so that the record is intact.
- Keeping records and managing them appropriately in a way that meets the council's legal obligations is the responsibility of all staff.

2.1 What is a record?

All business activities that deliver the council's functions are within the scope of this policy.

Records management is concerned with the capture and management of records and the information they contain. For the purposes of this policy, ‘records management’ is a broad collective term that refers to all recorded information (records, documents, and data) regardless of format, storage location or media on which it is created.

This scope includes, but is not limited to:

- Digital – Office documents, files held on network drives or in M365, data held in software.
- Applications, scanned records, emails, chats and posts in Teams, text messages such as WhatsApp, and social media such as X (Twitter).
- Hard copy paper files, microfiche, or microfilm.
- Audio and video recordings, photographs, slides, and multimedia content.
- Building maps and plans.
- Websites and intranet sites that provide information to employees or members of the public.
- Relevant metadata (data about the context, content and structure of other records listed above).

It is important that non-records are actively managed so that they can be easily retrieved and disposed of as soon as they are no longer required.

However, what is out of scope of this policy are the following:

- Reproduced documents kept for supply purposes where master copies have been retained already.
- Books, periodicals, newspapers being kept for reference purposes.
- Duplicate copies of documents kept for convenience.
- Personal materials which have no relation to official duties.

3. Legislation

Islington Council is committed to continuously improving the way it responds to requests for information under statutory access regimes. This includes the Freedom of Information Act 2000, the Data Protection Act 2018, the UK General Data Protection Regulation, and the Environmental Information Regulations 2004. Compliance, however, is reliant upon proper management of the council’s information, which needs to be managed, securely and easily located. The council regards all identifiable personal information relating to residents as confidential and all identifiable information relating to staff as confidential (except where national policy on accountability and openness requires otherwise). The council complies with the Data

Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), the Freedom of Information Act 2000 and the common law of confidentiality.

3.1 Lord Chancellor's Code of Practice for Records Management

The Lord Chancellor published a Code of Practice for records management in 2002 (revised in 2009) as a supplement to the Freedom of Information Act that all public bodies should follow. Section 7 states that 'Authorities should have in place a records management policy, either as a separate policy or part of a wider information or knowledge management policy.'

3.2 Data Protection Act 2018 and the UK General Data Protection Regulation

The Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR) requires all organisations that handle personal information to comply with six principles regarding privacy and disclosure. Particularly relevant to records management is the fifth principle, which states that 'Personal information shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.'

3.3 Local Government (Records) Act 1962

The Local Government (Records) Act 1962 gave local authorities limited discretionary powers to hold their records in local archives. In particular, the Act states that: 'A local authority may do all such things as appear to it necessary or expedient for enabling adequate use to be made of records under its control'.

3.4 Local Government Act 1972

The Local Government Act 1972 sets out the basic requirement for local authorities to 'make proper arrangements' to keep good records.

3.5 Roles and Responsibilities

Roles and responsibilities information will be covered in the Information Governance framework and Information Asset Owner procedure.

4. The policy

4.1 Overview

This section comprises the core policy statements and commitments that the council has made regarding this policy.

4.2 Business Classification and Retention Schedule

An important element of records management is classification. ISO 15489 defines classification as the “systematic identification and arrangement of business activities and/or records into categories according to logically structured conventions, methods, and procedural rules represented in a classification system”. In this model classification is concerned with providing the business context for a record.

Islington Council content is based around a variant of the Local Government Classification Scheme. The Islington variation is a three-tier classification comprising the elements: Function, Records Group and then Records Type.

Records should be stored where possible using a functional (rather than organisational) filing system, based around what services the council provide rather than by the name of the team or Directorate, as this is subject to change. Details of the council’s records, paper or electronic, will be recorded in the Islington classification scheme. The scheme divides records into ‘classes’, with appropriate retention periods and access controls recorded for each class.

The retention schedule can be found on the intranet and Information Asset Management compliance system, CoreStream. It sets how long records need to be stored before we can or should destroy them. Changes to retention periods, where required, will be approved between service areas, the Assistant Director for Information and Digital Governance/Data Protection Officer and Legal Services. Records will only be kept for as long as their contents have operational value and for as long as they may be required as evidence of the transactions they document. Any changes that need to be made to any retention periods should be submitted to the Information and Digital Governance Team as soon as they are identified.

4.3 Islington Council applies security classification to its information

The council has adopted the following security classification for its information:

Classification Marking	Description	Handling Guidance
PUBLIC	Designated for external sharing, typically information that can be published to the website e.g. corporate policies or disclosable under FOIA	No special handling needed
INTERNAL	General internal business communication e.g. internal email and documents relating to policy/process development. Not covered under other categories	No special handling required
CONFIDENTIAL	GROUP-BASED Extra care must be taken with storage and sharing, for example, organisational change proposals in development or draft budget	Care should be used when forwarding or sharing.
PERSONALLY IDENTIFIABLE INFORMATION	GROUP-BASED Information requires more protection as it contains information relating to individuals, for example, one to one notes, complaints, housing files etc. This information may include both personal and sensitive or special category data	Do not forward and encryption will be applied internally; use of OneDrive or SharePoint to share documents internally is recommended. Externally can only be shared with email addresses within trusted domains (.NHS/.pnn.police/.gov.uk) or via secure email or trusted systems
COMMERCIALLY SENSITIVE	GROUP-BASED Information has commercial implications, for example, project proposals, pricing schedules, vendor offers, procurement strategy etc.	Care should be used when forwarding or sharing internally and internal collaboration systems should be used where possible. Externally can only be shared via secure email or trusted systems
LEGAL PROFESSIONALLY PRIVILEGED	GROUP-BASED Information contains legal advice or evidence required or requested in an ongoing matter. Information should only be shared where legal privilege is maintained, for example, disclosure to external counsel, other legal parties e.g. opposition, the police or person/body to whom advice is being provided	Do not forward and encryption will be applied internally; use of OneDrive or SharePoint to share documents internally is recommended. Externally can only be shared via secure email or trusted systems

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Classification Marking	Description	Handling Guidance
RESTRICTED	GROUP-BASED Information contains particularly sensitive content where access to the information is to named individuals or agencies. For example, children's information, technical security standards that are applied	Information should only be shared where there is a lawful basis to do so

4.4 There is an Information Asset Register (IAR)/ Record of Processing Activities (ROPA)

Islington Council has an IAR/ROPA that identifies and manages the Information Assets owned by the council. It is stored within the IDG compliance system, CoreStream. It will be subject to an annual review (or as defined by the system based on risk) and any risks identified will be reported to the SIRO and appropriately monitored and managed by the IAO and Information Leads.

4.5 Islington Council will have clear Information Architecture

The council aims to ensure that a clear Information Architecture is in place, and this sets out the requirements for records to be stored in approved systems i.e. Line of Business systems and SharePoint/MS Teams locations. This architecture will prescribe approved systems for each type of record.

4.6 Email accounts and personal drives will not be used to store Islington Council information

Staff should only store case work or other council information in the location agreed by their IAO. This will usually be the specific system used by that department or Service Area or another corporately agreed secure location within the council's network. There will be an automatic minimal retention set for all council emails.

5. Scanning requirements for documents

Islington Council processes a variety of information, most is electronic, however, historical information is largely paper based. This procedure sets out the council's standards when scanning paper documents to ensure that legal admissibility is preserved.

The BS 10008 is the British Standard that outlines best practice for the implementation and operation of electronic information management systems, including the storage and transfer of information. It outlines the best practice for migrating paper records to digital files and provides advice for managing the availability and accessibility of any records that could be required as legal evidence. Please contact the IDG team for further information regarding the scanning of records that need to be retained.

5.1 Format and resolution

All documents must be prepared in RTF or PDF format. Where they are prepared in PDF format it is essential that the content is rendered in OCR (Optical character recognition). OCR involves computer software designed to translate images of typewritten text (usually captured by a scanner) into machine-editable text, or to translate pictures of characters into a standard encoding scheme representing them in (ASCII or Unicode). This is essential for subsequent indexing and searching.

Images should be prepared in at least 200dpi in black and white.

5.3 Metadata

5.3.1 All scanned documents must have metadata

Metadata needs to be prepared for all scanned documents. This must be provided at the document level, i.e. the actual document needs to have metadata attached to it that helps to identify minimum information about the document. It is not sufficient for the metadata to be contextual, i.e. defined by its location.

5.3.2 What is metadata?

The most common definition of metadata is 'data about data'. A more helpful definition is that it is structured information about a resource. For example, a catalogue selling household items gives the metadata of those items: the brand, price, colour, and capacity. A library catalogue contains metadata relating to books: their titles, authors, publishers, etc. Metadata enables a resource to be found by indicating what the resource is about and how it can be accessed with a series of structured descriptions.

5.3.3 What metadata is mandatory?

The following elements from the Government Metadata Standard must be populated for every scanned document.

Creator:
To enable a resource to be tracked when the division creating it has been disbanded or the Creator has moved on, include the full hierarchy, e.g. department, division, section, team. It is often best to ‘depersonalise’ the Creator and give the job title rather than the person’s name.

Date:
A date associated with an event in the life cycle of the resource.

Disposal:
The retention and disposal instructions for the resource. This should be listed in specific in a format that describes how long this is, in days, months and years, as well as when this period began.

Identifier:
An unambiguous reference to the resource within a given context. In case management systems, this will be the case management number.

Publisher:
The publisher is the person or organisation a user needs to contact to obtain permission to republish the information contained in the resource or to obtain copies in a different format.

Subject:
The top-level Local Government Category List subject must be provided:

- Business
- Community and living
- Council and democracy
- Education and learning
- Environment
- Health and social care
- Housing
- Jobs and careers
- Leisure and culture
- Transport and streets
- Islington Schools

5.3.4 Title

The title should be the formal title. If the resource does not have a formal title, then it is recommended to create a meaningful title. The meta tag should be customer focused. Make it brief and meaningful rather than clever and catchy.

5.3.5 Type

This is essential since it links directly to the retention schedule. It must be selected from the following list:

- Advertisements
- Annual Reports
- Briefing Notes
- Budgets
- Business Plans
- Circulars
- Consultation Papers
- Contracts
- Correspondences
- Decision letters / notices
- External Guidance
- Factsheet
- Forms (downloadable)
- Instructional Literature
- Job advertisements
- Legislative
- Letters
- Map
- Minutes
- Organisational
- Policies
- Policy papers
- Press releases

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- Procurement (contracts, tenders)
- Reports
- Statistics
- Terms of Reference

6. Offsite records

All records that are kept offsite will be held and managed according to the corporate classification scheme and kept according to agreed periods in the retention and disposal schedule.

The following minimum standards must be adhered to when utilising offsite storage facilities.

- When boxes are ordered for offsite storage, staff must ensure to record the box of contents, including details such as document type, retention periods and storage location.
- Staff must define and enforce strict access controls to limit who can retrieve documents from offsite storage.
- Staff must ensure to keep a document of all document access and retrieval activities.
- Regular review of documents in offsite storage must be carried out to identify opportunities for disposal in accordance with the council's retention schedule.
- Please refer to the Records Management Policy for further information on council policy in relation to storing records and files.

7. Islington Council will adopt an archive selection policy

The council will implement an archive selection policy that will set out how documents should be appraised for permanent archival preservation, specify the selection criteria, and set out which archival institutions should be used.

8. Islington Council will ensure Digital Preservation is in place

The council will set out the preferred use of long-term formats, formation conversion and ensure that other preservation methods are identified to prevent records becoming unusable in the future.

9. Islington Council will ensure appropriate contract clauses are in place

The council will ensure that any contracts with third party data processors will have appropriate Data Protection, UK GDPR, and record management clauses regarding the agreed and approved methods of information handling and storage and, if relevant, set out how information will be transferred back to the council at the end of a contract.

For further information about Islington Council's compliance with data protection law and records management, please contact: dp@islington.gov.uk