

Records Management Policy

Document Control

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1.0	13/05/2015	Nicki Hargreaves	Approved version published

Introduction and Purpose

This high level policy sets out our commitment to achieving high standards in records management. The policy will be supported through the delivery of standards, guidance and procedures, which are documented within the Information Governance Policy Framework.

Records management is vital to the delivery of our services in an orderly, efficient, and accountable manner. Effective records management will help ensure that we have the right information at the right time to make the right decisions. It will provide evidence of what we do and why, therefore protecting the interests of the Commissioner, his staff and all who interact with the Information Commissioner's Office (ICO). Records, and the information they preserve, are an important corporate asset.

We aim to balance our commitment to openness and transparency with our responsibility as an effective regulator. So we will create and manage records efficiently, make them accessible where possible, protect and store them securely and dispose of them safely at the right time.

By adopting this policy we aim to ensure that the record, whatever form it takes, is accurate, reliable, ordered, complete, useful, up to date and accessible whenever it is needed to:

- help us carry out our business;
- help us to make informed decisions;
- protect the rights of employees, regulated entities, and the public;
- track policy changes and development;
- make sure we comply with relevant legislation;
- provide an audit trail to meet business, regulatory and legal requirements;
- make sure that we work effectively as a regulator and prosecuting authority and meet our lawful obligations for disclosing evidence;
- support continuity and consistency in management and administration;
- make sure we are open, transparent and responsive;
- support research and development; and
- promote our achievements.

Scope

This policy, together with the associated standards, applies to the management of all documents and records, in all technical or physical formats or media, created or received by the ICO in the conduct of its business activities. It applies to all staff, contractors, consultants and third parties who are given access to our documents and records and information processing facilities.

Statutory and Regulatory Environment

The Information Commissioner is a data controller with obligations set out in the Data Protection Act 1998 and a public authority with obligations under the Freedom of Information Act 2000.

The legal and regulatory framework for records management is outlined below and includes:

The legislation regulated by ICO:

- The Data Protection Act 1998
- The Freedom of Information Act 2000
- Privacy and Electronic Communications Regulations 2003
- The Environmental Information Regulations 2004

Other related legislation:

- The Public Records Act 1958
- The Re-use of Public Sector Information Regulations 2005

Related guidance and codes of good practice:

- Section 46 Freedom of Information Act – Records Management
- BS ISO15489 – Records Management
- The ICO's published guidance and codes of practice

Responsibilities

We have a responsibility to ensure that our records are managed well. Different staff have different roles in relation to records management and these responsibilities are detailed below:

Accounting Officer – The Information Commissioner has overall accountability for records management.

Senior Information Risk Owner (SIRO) – The Deputy Chief Executive Officer has overall responsibility for managing records management risks.

Information Asset Owners (IAOs) - are responsible for ensuring that their directorates have local procedures and guidance in place which comply with the records management policy and standards. IAOs will nominate a Local Records Officer to take the lead on records management issues in their department.

Information Governance Steering Group (IGSG) - has responsibility for agreeing the records management policy and considering and approving changes to it, along with reviewing quarterly reports on records management matters.

The **SIRO** is supported by specialists within the **Information Governance team** with day to day responsibility for records management. This includes a **Lead Records Management Officer** who has responsibility for all aspects of records management.

Local Records Officers – provide support to the information asset owners and act as a departmental point of contact for all records management matters.

All staff, contractors, consultants and third parties - everyone who receives, creates, maintains or has access to our documents and records is responsible for ensuring that they act in accordance with our records management policy, standards guidance and procedures.

Relevant standards, guidance and procedures

This policy is supported by **Standards** that set out how we will establish, implement, maintain and continually improve records management.

Guidance sets out recommended best practice in support of the standards or to serve as a reference when no standard is in place.

Procedures set out step-by-step instructions to assist staff in implementing this policy and its supporting standards.

Standards	Guidance	Procedures
Records Management Standard 1 – Document Creation (Pending)	Naming conventions guidance	
	How to apply version control	
Records Management Standard 2 - Capture / Storage of information (Pending)	Managing Emails within Meridio	Offsite storage process
	Documents and Records – what is the difference?	
Records Management Standard 3 - Use and Security of information (Pending)		How to check Meridio user access controls
Records Management Standard 4 – Retention and Disposal (Pending)		Retention and Disposal Schedule
		What to do when a member of staff leaves the ICO
		TNA Appraisal Report (Pending)
		TNA Transfer Procedure (Pending)

Monitoring and Compliance

Ongoing monitoring of compliance with this policy and supporting standards will be undertaken on a regular basis by the Information Asset Owners and the Information Governance team, with assistance from Local Records Officers.

Policy Review

This policy will be reviewed annually. Unscheduled reviews will take place in the event of significant change.