Records Management Policy

RM00

Version History

Version	Date	Description	Author, Role
2.1	14/12/15	Revised policy replaces Records Management Policy 2.0 published 18/12/12	Catrina Finch, Records Manager
2.2	13/01/16	Incorporation of amendments from the Information Governance Board	Catrina Finch, Records Manager
2.3	18/01/16	Incorporation of some further amendments from Information Governance	Catrina Finch, Records Manager
3.0	21/01/16	Final version	Catrina Finch, Records Manager
4.0	16/03/18	Revised following legislative changes	Catrina Finch, Records Manager
4.1	01/04/20	Minor amendment Data Protection Bill 2017 amended to Data Protection Act 2018	Catrina Finch, Records Manager
4.2	19/05/21	Minor amendment, GDPR amended to UK GDPR	Catrina Finch, IG Technical specialist
4.3	23/11/21	Home and mobile working sections expanded, and Confidential waste/disposal incorporated into document	Catrina Finch, IG Technical specialist
5.0	17/02/22	Approved by members of the IG Board and SEB	Catrina Finch, IG Technical specialist
6.0	14/11/23	Review	IG Team

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Introduction

The City of Wolverhampton Council (the Council) recognises that records are valuable assets and vital to delivering high quality public services. Effective records management is essential in enabling the Council to comply with its legal and regulatory obligations.

The Council is committed to establishing and maintaining recordkeeping practices which provide evidence of its activities, demonstrate transparency, provide reliable information for its stakeholders, and safeguard all personal data held. For the avoidance of doubt, the following definitions will apply:

- **Records** are information, received and maintained as evidence;
- **Information** is knowledge that has been recorded;
- **Documents** are items created in council systems. Some may be records, some may not be.

Legal and Regulatory Obligations for the Council

Relevant Legal requirements and standards that the Council works to are as follows:

- Local Government (Records) Act 1962
- Local Government Act 1972
- Freedom of Information Act 2000
- Environmental Information Regulations
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Human Rights Act
- Legislation, guidance, or best practice standards specific to service areas
- The Independent Inquiry into Child Sexual Abuse (IICSA), (Now closed)
- BS10008 Evidential weight and legal admissibility of electronic information
- The Lord Chancellor's Code of Practice Under Section 46 of the Freedom of Information Act 2000
- BS ISO 15489-1:2001. Information and documentation. Records Management
- BS EN 15713 Secure Destruction of Confidential Material
- Digital Economy Act 2017

The Council recognises that there are risks associated with non-compliance with the law. This policy aims to mitigate risks such as:

- Significant risk to the Council, its customers, partners and stakeholders;
- Inappropriate disclosure of information, leading to major incidents;
- Legislative or financial penalties;
- Loss of reputation and damage to the Council's corporate image.

Scope

This policy will apply to anyone accessing or using Council data, including for example: employees, temporary or contract staff, volunteers, work placements, council members, contractors, suppliers, service providers or other partner agencies.

It applies to all records regardless of their format. A record is recorded information, in any form, which is created or received by the Council and maintained as evidence of its activities and transactions. Records can include any of the following:

- Paper documents
- Scanned documents
- Electronic documents including Word documents, spreadsheets, pdfs and presentations
- Emails which document business activity and decisions
- Microsoft Teams, including chats, channels and files
- Audio and video tapes, cassettes, CD ROM, recorded meetings in Teams etc.
- CCTV recordings
- Text messages or online messages
- Minutes of meetings
- Microfiche/film
- Plans, drawings, and maps
- Case notes and updates
- Recordings
- Notes of telephone conversations
- Social media and other messaging apps e.g., WhatsApp messages relating to business activities

This list is not exhaustive and will include any storage means for holding records relating to council business activities.

Purpose

The purpose of this policy is:
- To ensure council activities are documented to meet business needs, accountability, and legal requirements through effective recordkeeping practices for creating, controlling, retaining, and disposing of records.
- To ensure the integrity and authenticity of records to allow well-informed decision making by the Council.
- To acknowledge the importance of effective records management and demonstrate the Council's commitment to this.
- To act as a mandate for effective recordkeeping practices across all of its activities.

- To make employees and third parties aware of their recordkeeping responsibilities.
- To set out the Council's corporate approach to records management, in accordance with British Standard and International Standard (BS/ISO) 15489- Records Management, and as required under the Lord Chancellors Code of Practice on Records Management, issued under Section 46 of the Freedom of Information Act 2000.
- To support the Council's responsibilities as Data Controller under the Data Protection Act 2018 (which updates data protection laws for the digital age), and the UK General Data Protection Regulation (UK GDPR). Also, as a public authority subject to the Freedom of Information Act and related legislation.

Definitions

Please see Information Governance Key terms and definitions.

Policy detail

What is records management?

Records management is the process used to manage records at each stage of their lifecycle. From creation, when naming conventions, version control and metadata[1] are applied, through active use when records need to be tracked and safeguarded from unauthorised access, to retention, when they need to be safely and securely stored for as long as they're needed for business and legal purposes, to appraisal and disposal in line with retention and disposal criteria.

Who does this policy apply to:

Everyone who is employed by the Council (permanent and temporary members of staff, agents, contractors, and consultants) has a responsibility to create records that document their official activities and manage them in accordance with the Council's policies, standards, procedures, and guidelines.

What is an official record?

Records created and received in the course of council business activities form part of the corporate memory and do not belong to the employee, agent or contractor who created or received them. They must therefore be preserved and safeguarded for as long as they're needed for business and legal purposes in the appropriate recordkeeping system where they can be shared with whoever has authorisation to access them. This applies to all records regardless of their physical location or format.

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[1] A very general term for metadata is "data about data". Examples of metadata include title, subject, date created and creator.

Official records must be:

Records must be reliable and contain full, accurate and up to date information. They should be created at the time of the business activity to which they relate, or as soon as possible after it. The creation of appropriate records should be incorporated into local business processes based on business needs, regulations, and stakeholder expectations.

Records must be usable and located in official recordkeeping systems where they can be preserved until the end of their retention period and easily retrieved. Their content and context must be understandable to whoever has authorisation to access them. It should be clear as to why the record has been created, who created it and when it was created. Records relating to the same business activity should be grouped together and cross referenced regardless of their format. Employees must ensure conformance with any titling and classification instructions for their business area at the time the record is created or captured in the official recordkeeping system.

Storage of official records

Official records should not be held in personal drives, Outlook email boxes and Microsoft Teams Chat as these do not have adequate record keeping functionality and cannot ensure access and evidence of business activity over time.

Records must be moved from these into the official record keeping system appropriate to each service area. Records will rarely need to be duplicated and personal copies of records should not be created and kept. Any ephemeral information (non-records) should be disposed of immediately after it is no longer required.

Protection of official records

Records must be trustworthy and should therefore be safeguarded against alteration and damage. Any authorised amendments must be clearly identified and traceable. The Council's policy is to create, store and manage its records electronically. Electronic records not held to an acceptable standard will lose much of their evidential value. It is important therefore that the scanning of records should comply with British Standard, BS10008 and any migration of records from one system to another be carefully controlled.

Unauthorised access

Records must be kept secure from unauthorised access according to the sensitivity of their content and the correct protective marking procedures followed. All employees must have completed the mandatory protecting information training and apply this to all handling of records, including when transporting records and when remote working.

Retention of official records

The Council's records must be held only as long as they are needed to meet business, legal and regulatory requirements. They should then be disposed of securely in line with Retention and Disposal Schedules.

Retention and Disposal Schedules should be maintained and implemented by service area managers with guidance and advice provided by the Information Governance Team.

Any records deemed worthy of historical interest must be notified to the Information Governance Team who will arrange for their transfer to the City Archives for preservation.

Agile working

All employees, whilst mobile working or working from home, must remain aware of the sensitivity of the information they are handling and ensure it cannot be seen or overheard. Laptops should be locked when not in use, even for short periods, and password security maintained. Records should be accessed electronically via official council systems and paper records should not be transported off site, unless this is unavoidable. If paper records do have to be taken off site, they must be kept securely at all times to ensure against unauthorised access, loss or damage.

Disposal of records and IT equipment

Personal or confidential information that has reached the end of its retention period and is no longer needed must be securely disposed of. The Council has a contract for the secure disposal of paper records and any confidential paper waste should be disposed of using the confidential waste bins located in council premises.

Any IT equipment, or electronic storage media, which needs to be disposed of must be returned to IT Services for secure disposal. Please refer to the Digital and IT Acceptable Use Policy

Responsibilities of 3rd party contractors

Clauses on record keeping responsibilities must be included in contracts with third parties and partner organisations. It must be made clear from the outset the standard of record keeping expected and where responsibility for holding the records will rest. If appropriate, records management training and guidance will be provided for the partner organisation.

Roles and Monitoring

Please see Information Governance Key terms and definitions.

This policy will be approved and monitored by the Council's Information Governance

Board. It will be reviewed every 2 years or sooner if legislative changes require.

Compliance with this policy will be monitored by the Information Governance Team and regular reports on progress will be submitted to the Information Governance Board.

Training and dissemination

The policies will be disseminated via the Council's City People news articles, and the Operational Managers Network. The policies will be available on the Council's public website.

Links to other Policies

This Policy forms part of the Information Governance Framework and should be read in conjunction with the other related policies within the framework which are available on the Councils website here [What is Information Governance? | City Of Wolverhampton Council](#);

- IG00 Strategy
- AI00 Access to Council Information
- DP00 Data Protection Policy
- IS00 Information Security Policy
- Information Governance Definitions, Roles and Responsibilities