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**Records Management Policy v1.1**

**Approved  
Information Classification: OFFICIAL**

**Reviewed: June 2021**

**1 Introduction**

Records are an organisational asset and should be managed effectively and efficiently in order to comply with legal and regulatory obligations.

Coventry City Council (CCC) is dependent on the availability of accurate and reliable records for the effective and efficient conduct of its business. These records provide evidence of the Council’s corporate and historical business activities and require careful management. This Policy provides a framework through which effective management of CCC’s assets can be achieved and audited.

Effective Management of information is vital in:   
• Providing evidence of actions, transactions and decisions  
• Supporting policy formation and managerial decision-making  
• Helping to deliver services in a consistent and equitable manner

• Meeting our obligations under the Data Protection Act 2018/UK GDPR.

**2 Scope**

This policy applies to all employees, elected members and should be included in all contracts for third parties providing services to the CCC, or working in partnership with the Council to provide services to others. There are no exclusions.

It applies to all records created by staff and contractors in the course of their work and includes all types such as: files, papers, maps, plans, non-standard paper documents, as well as electronic records in all formats including: computer files, email and databases, video, audio and CCTV recordings. It also applies to all records that may be held in CRM systems.

**3 Policy Statement**Coventry City Council will provide a framework for managing its records, to support the efficient management, storage and retrieval of documents throughout their lifecycle ensuring that:

• Records that are business critical are identified and preserved

• records are only kept for as long as they are required and that they are retained or deleted in accordance to the Councils Retention & Disposal Schedule

• Records can be trusted to reliably represent the information that was actually used in,  
or created by, the Council’s business processes, at any point in time;  
• Legal and statutory record-keeping requirements are met; and  
• The Council follows best practice guidance from the Lord Chancellors Code of Practice  
on Records Management, issued under Section 46 of the Freedom of Information Act  
2000.

**4 Information Management Framework**CCC has implemented a framework of processes, procedures, standards and training materials, together with defined roles and responsibilities (for IAO’s and IAM’s) that has been established, in order to support compliance with this policy so that:  
i) Appropriate information and documents are captured as records;  
ii) Records can be easily accessed by those who need them;  
iii) Records are available for as long as they are required in accordance with legislation and listed in the Corporate Retention and Disposal Schedule;  
iv) Records are disposed of appropriately when no longer required - in line with legal and regulatory obligations;  
v) Records will be appropriately marked and kept securely and protected from accidental  
loss or destruction.  
vi) Special consideration will be given to 'vital records': those records deemed of greatest importance to the Council's continuity of business, these will be identified via the CCC Information Asset Register  
vii) Attention will also be given to preservation of existing Council records as systems may change.

**5 Roles & Responsibilities**

**Chief Executive**The Chief Executive is the accountable officer responsible for the management of the Council and for ensuring appropriate mechanisms are in place to support service delivery and continuity. Information lifecycle and records management is key to this as it will ensure appropriate, accurate information is available as required. The Council has a particular responsibility for ensuring that it corporately meets its legal responsibilities, and for the adoption of internal and external governance requirements.

**Senior Information Risk Owner (SIRO)**The Council has appointed the Director of Finance as Senior Information Risk Owner (SIRO). The SIRO will act as an advocate for information risk on the Board and in internal discussions will provide written advice to the Accountable Officer on the content of their annual Statement of Internal Control (SIC) in regard to information risk.

**Caldicott Guardian**  
The Caldicott Guardian has a key role in ensuring that partner organisations satisfy the highest practical standards for handling information. They act as the "conscience" of the organisation, actively support work that facilitates and enables information sharing and provide advice on options for lawful and ethical processing of information. A particular responsibility for reflecting service user’s interests regarding the use of (where applicable) service user identifiable information. They are responsible for ensuring Data Subject identifiable information is shared in an appropriate and secure manner.

**Information Asset Owners (IAO’s)**

Information Asset Owners provide quarterly assurances to the SIRO detailing any information assets (records) perceived to be at risk. Quarterly return provides SIRO with evidence to support the SIC.

**Information Asset Managers (IAM’s)**

Information Asset Managers manage the Information Asset Register, which is considered a key vital function of the council. They are also responsible for keeping destruction / disposal log updated

**Records Manager (RM)**

The Records Manager is responsible for the guidance on good records management processes and for promoting compliance with this policy, through the provision of advice on retention and management of team records and storage of records.

**All Staff**

Under the Public Records Act all Council employees are responsible for any records that  
they create or use in the course of their duties. Thus any records created by an employee of the Council are public records and may be subject to both legal and professional obligations.

It is the responsibility of all employees to adhere to this policy when handling all types of Council information.

**6 The Information Lifecycle**

**6.1 Creation**

When creating information/records in the first instance, the following should be adhered to. Records should be:

**Available when needed** - to enable a reconstruction of activities or events that have taken place;

**Accessible to all members** of staff that require access in order to enable them to carry out their day to day work **-** the information must be located and displayed in a way consistent with its initial use and that the current version is clearly identified where multiple versions exist;

**Interpretable, clear and concise** - the context of the information must be clear and be able to be interpreted appropriately, i.e. who created or added to the record and when, during which business process and how the record is related to other records;

**Trusted, accurate and relevant** - the information must reliably represent the initial data that was actually used in, or created by, the business process whilst maintaining its integrity. The authenticity must be demonstrable and the content relevant;

**Secure** - the information must be secure from unauthorised or inadvertent alteration or erasure. Access and disclosure must be properly controlled and audit trails used to track all use and changes. The information must be held in a robust format which remains readable for as long as the information is  
required/retained;

**Scanned** - for reasons of business efficiency, or in order to address problems with storage, consideration should be given of the option of scanning into electronic format, records which currently exist in paper format. Where this is proposed, the factors to be taken into account include:  
  
§ The costs of the initial and then any later media conversion to the required;  
§ Standard, bearing in mind the length of the retention period for which the records are required to be kept;  
§ The need to consult in advance with the local Place of Deposit or The National Archives with regard to records which may have archival value, as the value may include the format in which it was created; and  
§ The need to protect the evidential value of the record by copying and storing the record in accordance with British Standards

In order to fully realise the benefits of reduced storage requirements and business efficiency, the information owners should consider disposing of paper records that have been copied into electronic format and stored in accordance with appropriate standards.

Employees should consider the following when creating information:

* What they are recording and how it should be recorded;
* Why they are recording it;
* How to validate information (especially with the patient or carers or against other  
  records) to ensure they are recording the correct data;
* How to identify and correct errors and how to report errors if they find them;
* The use of information; staff should understand what the records are used for  
  and therefore why timeliness, accuracy and completeness of recording is so  
  important;
* How to update information and how to add in information from other  
  sources

**6.2 Use**

All information must be used consistently, only for the intentions for which it was intended and never for an individual employee’s personal gain or purpose. If in doubt employees should seek guidance from the Records Manager, IAO or IAA. Alternatively the Senior Information Governance Officer SIGO.

**Disclosure** - only the specific information required should be disclosed to authorised parties and always in accordance and with strict adherence to the Data Protection Act. There are a range of statutory provisions that limit, prohibit or set conditions in respect of the disclosure of records to third parties, and similarly, a range of provisions that require or permit disclosure.

**The Authority’s Caldicott Guardian and support staff should be involved in any proposed disclosure of confidential service user information.**

**6.3 Retention**

The retention period varies dependant on the type of information being stored.

All CCC Records retention periods should be detailed in the information asset register and can be checked in the Corporate Retention and Disposal Schedule available on the IG Handbook

The information must be relevant, fit for the purpose it was intended and only retained for as long as it is genuinely required.

**6.4 Transfer** – The mechanisms for transferring information from one organisation to another should also be tailored to the sensitivity of the material contained within the records and the media on which they are held.  
The Information Governance SIGO or Records Manager can advise on appropriate safeguards.

**6.5 Disposal:** It is particularly important under Data Protection legislation that the disposal of records, which is defined as the point in their lifecycle when they are either transferred to an archive or destroyed, is undertaken in accordance with clearly established policies which have been formally adopted by the Council and which are enforced by properly trained and authorised staff.

**Destroyed appropriately –** records can contain sensitive or confidential information. It is therefore vital that confidentiality is safeguarded at every stage and that the method used to destroy records is fully effective and secures their complete illegibility and inability to be reconstructed. Any records that have been identified for destruction must be destroyed as soon as possible after they are eligible. Further guidance on destruction can be requested from the Records Manager.

**Disposal / Destruction Log** – All areas in each directorate are expected to keep an updated log detailing records disposed of and destroyed. **7 Training & Awareness**All employees of CCC create, maintain or use records. It is, therefore, vital that everyone understands their responsibilities for records management. IAOs will ensure that staff responsible for managing records are appropriately trained or experienced and understand the need for records management. Information Asset Managers and Information Asset Owners are expected to complete IAO training.

**8 Compliance with Policy**All users must comply with this policy and supporting records management framework. Directorates should regularly assess their compliance with this policy and local  
records management procedures.

**9 Communication of this policy**

This policy is approved by the IMSG and will be published on the Information Governance site. IAO’s are responsible for ensuring that their staff are aware of and compliant to the requirements as defined in this policy and related documents.

**10 Definitions**

Record – information or facts, set down usually in writing, as a means of preserving knowledge.

Information or data on a particular subject collected and preserved

Retention & Disposal Schedule – A table that provides guidance on the length of time a document record should be retained as an active record (for legal, business or historical reasons), time that it should be retained within an archive or the time for the destruction of the record.

Accountable Officer – The MD or CEO of the organisation or company

Data Subject - Person/individual who the information/data, held by the Council, is about

**11 Related Documents**

Process for Archiving

Retention & Disposal Schedule

Data Handling Policy

Guidance on Dealing with Sensitive or Business Critical Information

**Version History**

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| --- | --- | --- | --- | --- |
| Version | Status | Date | Author | Summary of Changes |
| 1.0 | Final  Approved | 18/09/2017 | S. Lock | New Policy |
| 1.1 | Updated | 20/06/2021 | S. Lock | Review and update |
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**Reviewers**

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**Management Approval**

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| --- | --- | --- |
| Name | Date | Version No. |
| IMSG | September 2017 | 1.0 |

**Distribution**

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