

ARMAGH CITY, BANBRIDGE AND CRAIGAVON BOROUGH COUNCIL		
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Armagh City Banbridge & Craigavon Borough Council Records Management Policy

Part 1 – Introduction

1.1 What is Records Management?

Records management is the systematic control of an organisation's records, throughout their life cycle, in order to meet operational business needs, statutory and fiscal requirements, and community expectations. Effective management of corporate information allows fast, accurate and reliable access to records, ensuring the timely destruction of redundant information and the identification and protection of vital and historically important records.

1.2 Why is a Records Management Policy Necessary?

Armagh City Banbridge & Craigavon Borough Council requires a corporate statement on records management because – like all organisations – it is dependent on its records for the effective and efficient discharge of its responsibilities. Failure to manage its records properly constitutes a significant risk to the Council.

The Council's records are its corporate memory, providing evidence of decisions and actions and supporting its daily functions and operations (including compliance with legal and regulatory requirements). They support policy development and managerial decision making, protect the interests of Council and the rights of employees, service users and residents and help to deliver services in an accountable, consistent and equitable way. They help Council make good use of organisational experience. They support consistency, continuity, efficiency and productivity in service delivery, management and administration.

A clear statement of policy is considered essential to communicate the Council's position on records management.

1.3 Legal requirements

The Public Records Act (NI) 1923 declares the records of district councils in Northern Ireland, along with those of Government departments, the Courts and Non-Departmental Public Bodies, to be public records under the charge and overall superintendence of a government department (currently the Department of Culture, Arts & Leisure). As such, a Council's records cannot be disposed of without reference to the Public Records Office of Northern Ireland (PRONI), the body that acts on behalf of the Department. Those records which are selected

for permanent preservation by PRONI form part of the cultural and archival heritage of the Borough.

There is also a legislative requirement on Council to implement records management as set out in the Public Records Act (NI) 1923 and in The Disposal of Documents Order (No. 167) 1925. PRONI has established standards and guidance on records management which the Council will endeavour to follow, together with standards and guidance issued by other archival institutions and British Standards (BSI) accepted in records management.

The Council is required by law to comply with the Data Protection Act 1998. The Act protects personal privacy and upholds individuals' rights by regulating the processing of personal information about identifiable living individuals. It sets out rules for good information handling, known as the eight enforceable Data Protection Principles. The Council's Data Protection Policy outlines Council's commitment to meeting its obligations under the Act.

The Council is also required to comply with the Freedom of Information Act 2000 and Environmental Information Regulations 2004, which aim to increase public access to information held by public authorities. The primary duty under both pieces of legislation is to respond to individual requests for information, subject to certain conditions and exemptions/exceptions. Under the Freedom of Information Act, the Council must also adopt and maintain a Publication Scheme, which lists that information which is routinely available to the public, without having to make a specific request. . The Lord Chancellor's Office has issued Codes of Practice¹ regarding records management and responding to requests for information. The Code of Practice on records management stresses that having a clear statement of corporate policy is a significant element for compliance with the Freedom of Information Act.

The Council also has an obligation under Section 75 of the Northern Ireland Act 1998 to ensure that it has due regard to the promotion of equality of opportunity between persons within the nine specified categories. Council must take this into account when developing procedures with regard to access to information, by both public and employees.

Part 2: Scope of Policy

- 2.1 The policy primarily applies to all Council managers and staff who have responsibility for maintaining records created or received by the Council in the course of its business. The policy also applies to Elected Members insofar as they also hold records relevant to Council business and any third party organisation holding and/or processing records on behalf of Council.

¹ Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000

- 2.2 Records are defined as in the relevant British Standard as “information created, received and maintained as evidence and information by an organisation or person in pursuance of legal obligations or in the transaction of business”.

The records management principles apply irrespective of the medium in which the record is held (including paper, electronic storage, photographic, microfilm, map, drawing or artefact).

Part 3: POLICY STATEMENT

- 3.1 Armagh City Banbridge & Craigavon Borough Council recognises that its records are part of the cultural and archival heritage of the Borough.

Council recognises its obligation to ensure that its records are managed effectively and efficiently and at least cost, commensurate with legal, operational and information management guidelines. It is committed to meeting its responsibilities under the Public Records Act (NI) 1923, the Disposal of Documents Order (No.167) 1925, the Data Protection Act 1998; and the Freedom of Information Act 2000.

- 3.2 The Council recognises the basic principles of good records management and that records should be:

Authentic - It must be possible to prove that records are what they purport to be and who created them, by keeping a record of their management through time. Where information is later added to an existing document within a record, the added information must be signed and dated. With electronic records, changes and additions must be identifiable through audit trails.

Accurate - Records must accurately reflect the transactions that they document.

Accessible - Records must be readily available when needed.

Complete - Records must be sufficient in content, context and structure to reconstruct the relevant activities and transactions that they document.

Comprehensive - Records must document the complete range of an organisation's business.

Compliant - Records must comply with any record keeping requirements resulting from legislation, audit rules and other relevant regulations.

Effective - Records must be maintained for specific purposes and the information contained in them must meet those purposes.

Secure - Records must be securely maintained to prevent unauthorised access, alteration, damage or removal. They must be stored in a secure environment, the degree of security reflecting the sensitivity and importance of the contents, in particular personal data. Where records are migrated across changes in technology, the evidence preserved must remain authentic and accurate.

- 3.3 The Council will
- Ensure a Council-wide framework for the management of records in all mediums;
 - Promote and ensure compliance with legislative requirements and best practice standards;
 - Ensure that all records can be used as an information resource which enhances their value as assets of the organisation; and
 - Identify the roles and responsibilities for ensuring good records management.
- 3.4 To achieve this, the Council will undertake a programme of work
- To implement best practice in its systems and procedures for records management to ensure that records are managed throughout their life cycle in a medium appropriate to their function;
 - To develop and maintain information retrieval systems which facilitate access to individual records;
 - To ensure records are protected and kept securely in a manner commensurate with their value to the operation and business continuity of the Council and the archival heritage of the Borough;
 - To adopt and operate a Retention & Disposal Schedule to ensure records are maintained for the appropriate period of time and that those records worthy of permanent preservation are identified as early as possible;
 - To ensure the accuracy of the Council's notification entry in the Data Protection Register and that personal data is processed in accordance with the Data Protection principles (see Council's Data Protection Policy); and
 - To ensure that the Council's Publication Scheme is maintained and that requests for information are handled in compliance with the Freedom of Information Act 2000 and Environmental Information Regulations 2004.
- 3.5 This policy will be reviewed at least once every three years and be amended as required to reflect legislative and technological change and best practice.

Part 4: Roles and Responsibilities

- 4.1 The main roles and responsibilities for implementation of the policy are shown below:

The Council is responsible for adopting the policy on records management and ensuring that those responsible for its implementation are held accountable for its delivery.

Individual Members are responsible for ensuring that they support the concept of good records management and adhere to the principles of data protection and freedom of information as public representatives.

The Chief Executive is responsible for ensuring that the Council complies with legislative requirements relating to records management, the Data Protection Act 1998 and the Freedom of Information Act 2000.

The Senior Records Manager is responsible for the development, promotion and effective operation of the records management function within Council, ensuring that recognised management standards and good practice are maintained. This officer is responsible for ensuring appropriate legacy disposal in relation to records held by the former Armagh City & District Council, Banbridge District Council and Craigavon Borough Council.

Strategic Directors and Heads of Department are responsible for ensuring that all information and records management systems within their control comply with the policy statement and corporate guidelines. They are also responsible for ensuring that guidelines and records management procedures are developed and maintained for their operational units and communicated to employees.

All employees are accountable to their line managers for compliance with this policy and related corporate guidelines and operational procedures.

Others – this policy applies to any individual or organisation acting on behalf of Armagh City Banbridge & Craigavon Borough Council.

Part 5: Related Policies

5.1 The key policies related to the Records Management Policy are:

- (a) the Data Protection Policy which outlines responsibilities relating to the processing of personal data; and
- (b) the Access to Information Policy which outlines responsibilities relating to access to information by the general public under the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004.

APPENDIX 1 – POLICY SCREENING FORM

Policy Screening Form

Policy Scoping

Policy Title: RECORDS MANAGEMENT POLICY

Brief Description of Policy (please attach copy if available). Please state if it is a new, existing or amended policy.

Policy outlines Council's commitment to effective and efficient records management ensuring compliance with legislative requirements.

Intended aims/outcomes. What is the policy trying to achieve?

- Ensure a Council-wide framework for the management of records in all mediums;
- Promote and ensure compliance with legislative requirements and best practice standards;
- Ensure that all records can be used as an information resource which enhances their value as assets of the organisation; and
- Identify the roles and responsibilities for ensuring good records management.

Policy Framework

Has the policy been developed in response to statutory requirements, legal advice or on the basis of any other professional advice? Does this affect the discretion available to Council to amend the policy?

Policy has been developed in accordance with the Lord Chancellor's Code of Practice on the Management of Records (issued under Section 46 of the Freedom of Information Act 2000) and is to ensure Council meets its responsibilities under the Public Records

Act (NI) 1923, the Disposal of Documents Order (No. 167) 1925, the Data Protection Act 1998, and the Freedom of Information Act 2000.

Are there any Section 75 categories which might be expected to benefit from the policy? If so, please outline.

Policy will benefit all

Who initiated or wrote the policy (if Council decision, please state). Who is responsible for implementing the policy?

Who initiated or wrote policy?	Who is responsible for implementation?
Stephanie Harte (Policy Development Officer)	Senior Records Manager

Are there any factors which might contribute to or detract from the implementation of the policy (e.g. financial, legislative, other)?

None identified

Main stakeholders in relation to the policy

Please list main stakeholders affected by the policy (e.g. staff, service users, other statutory bodies, community or voluntary sector, private sector)

Management and Staff

Elected members

Individuals/organisations submitting information requests

Everyone benefitting from more effective service provision generally as a result of improved record/information management

Are there any other policies with a bearing on this policy? If so, please identify them and how they impact on this policy.

Access to Information Policy – Access to Information legislation imposes deadlines for meeting requests. Effective records management will ensure information is identified and located in a timely fashion.

Data Protection Policy – particular reference to the processing, retention and disposal of personal data

Available Evidence

Council should ensure that its screening decisions are informed by relevant data. What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

Section 75 category	Evidence
Religious belief	Technical policy to meet legislative and operational requirements –evidence by category basis not relevant
Political opinion	Technical policy to meet legislative and operational requirements –evidence by category basis not relevant
Racial group	Technical policy to meet legislative and operational requirements –evidence by category basis not relevant
Age	Technical policy to meet legislative and operational requirements –evidence by category basis not relevant
Marital status	Technical policy to meet legislative and operational requirements –evidence by category basis not relevant
Sexual orientation	Technical policy to meet legislative and operational requirements –evidence by category basis not relevant
Men and women generally	Technical policy to meet legislative and operational requirements –evidence by category basis not relevant
Disability	Technical policy to meet legislative and operational requirements –evidence by category basis not relevant
Dependants	Technical policy to meet legislative and operational requirements –evidence by category basis not relevant

Needs, experiences and priorities

Taking into account the information gathered above, what are the different needs, experiences and priorities of each of the following categories in relation to this particular policy/decision?

Section 75 category	Needs, experiences and priorities
Religious belief	Technical policy to meet legislative and operational requirements – no specific needs, experiences and priorities by Section 75 category
Political opinion	Technical policy to meet legislative and operational requirements – no specific needs, experiences and priorities by Section 75 category

Racial group	Technical policy to meet legislative and operational requirements – no specific needs, experiences and priorities by Section 75 category
Age	Technical policy to meet legislative and operational requirements – no specific needs, experiences and priorities by Section 75 category
Marital status	Technical policy to meet legislative and operational requirements – no specific needs, experiences and priorities by Section 75 category
Sexual orientation	Technical policy to meet legislative and operational requirements – no specific needs, experiences and priorities by Section 75 category
Men and women generally	Technical policy to meet legislative and operational requirements – no specific needs, experiences and priorities by Section 75 category
Disability	Technical policy to meet legislative and operational requirements – no specific needs, experiences and priorities by Section 75 category
Dependants	Technical policy to meet legislative and operational requirements – no specific needs, experiences and priorities by Section 75 category

Screening Questions

1. What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 categories?		
Category	Policy Impact	Level of impact (Major/minor/none)
Religious belief	Nil	None
Political opinion	Nil	None
Racial group	Nil	None

Age	Nil	None
Marital status	Nil	None
Sexual orientation	Nil	None
Men and women generally	Nil	None
Disability	Nil	None
Dependents	Nil	None

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories?

Category	If yes, provide details	If no, provide reasons
Religious belief		No – technical policy only
Political opinion		No – technical policy only
Racial group		No – technical policy only
Age		No – technical policy only
Marital status		No – technical policy only
Sexual orientation		No – technical policy only
Men and women generally		No – technical policy only
Disability		No – technical policy only
Dependents		No – technical policy only

3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion, or racial group?

Category	Details of Policy Impact	Level of impact (major/minor/none)
Religious belief	Nil	None

Political opinion	Nil	None
Racial group	Nil	None

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Category	If yes, provide details	If no, provide reasons
Religious belief		No – technical policy only
Political opinion		No – technical policy only
Racial group		No – technical policy only

Multiple Identity

Generally speaking, people fall into more than one Section 75 category (for example: disabled minority ethnic people; disabled women; young Protestant men; young lesbian, gay and bisexual people). Provide details of data on the impact of the policy on people with multiple identities. Specify relevant s75 categories concerned.

No impact – technical policy only

Disability Discrimination (NI) Order 2006

Is there an opportunity for the policy to promote positive attitudes towards disabled people?

Not applicable

Is there an opportunity for the policy to encourage participation by disabled people in public life?

Not applicable

Screening Decision

A: NO IMPACT IDENTIFIED ON ANY CATEGORY – EQIA UNNECESSARY

Please identify reasons for this below

No impact on any Section 75 category – technical policy to meet legislative and operational requirements only

B: MINOR IMPACT IDENTIFIED – EQIA NOT CONSIDERED NECESSARY AS IMPACT CAN BE ELIMINATED OR MITIGATED

Where the impact is likely to be minor, you should consider if the policy can be mitigated or an alternative policy introduced. If so, EQIA may not be considered necessary. You must indicate the reasons for this decision below, together with details of measures to mitigate the adverse impact or the alternative policy proposed.

N/a

C: MAJOR IMPACT IDENTIFIED – EQIA REQUIRED

If the decision is to conduct an equality impact assessment, please provide details of the reasons.

N/a

Timetabling and Prioritising

If the policy has been screened in for equality impact assessment, please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3 with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people’s daily lives	

The total rating score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the council in timetabling its EQIAs.

Is the policy affected by timetables established by other relevant public authorities? If yes, please give details.

N/a

Monitoring

Effective monitoring will help the authority identify any future adverse impact arising from the policy. It is recommended that where a policy has been amended or an alternative policy introduced to mitigate adverse impact, monitoring be undertaken on a broader basis to identify any impact (positive or adverse).

Further information on monitoring is available in the Equality Commission's guidance on monitoring (www.equalityni.org).

Identify how the impact of the policy is to be monitored

No monitoring – technical policy to meet legislative and operational requirements only with no impact on any Section 75 category.

Approval and Authorisation

A copy of the screening form for each policy screened should be signed off by the senior manager responsible for that policy. The screening recommendation should be reported to the relevant Committee/Council when the policy is submitted for approval.

Screened by	Position/Job title	Date
Stephanie Harte	Policy Development Officer	21 July 2015
Approved by	Position/Job Title	Date
Roger Wilson	Chief Executive	July 2015

Please forward a copy of the completed policy and form to:

mary.hanna@armaghbanbridgecraigavon.gov.uk or

stephanie.harte@armaghbanbridgecraigavon.gov.uk

who will ensure these are made available on the Council's website.

The above officers are also responsible for issuing reports on a quarterly basis on those policies “screened out for EQIA”. This allows stakeholders who disagree with this recommendation to submit their views. In the event of any stakeholder disagreeing with the decision to screen out any policy, the screening exercise will be reviewed.