Records Management Policy

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Accessible Information
Publication Scheme
Information Security Policy
Records Management
File Retention and Disposals Policy

1. Introduction

1.1.   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.

1.2.   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, Commission staff and all who interact with the Commission. Records, and the information they preserve, are an important corporate asset.

1.3.   We aim to balance our commitment to openness and transparency with our responsibility as a public authority. 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.

1.4.   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
- Support continuity and consistency in management and administration
- Make sure we are open, transparent and responsive
- Support research and policy development
- Promote our achievements

2. Scope

2.1.   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 Commission 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.

2.2.   This Records Management Policy defines how the Commission manages all of its records, including electronic records. The policy is endorsed by the Commission's Board and made available to all staff at all levels of the Commission, both on induction and at regular training.

2.3.   The policy provides a mandate for the performance of all records and information management functions. In particular, it sets out the Commission's commitment to create, maintain and manage records and document its principal activities in this respect.

2.4.   The policy also:

- Outlines the role of records management within the organisation, and its relationship to the Commission's overall strategy
- Defines roles and responsibilities within the organisation, including the responsibility of individuals to document their actions and decisions in the Commission's records, and to dispose of records appropriately when they are no longer required
- Provides a framework for supporting standards, procedures and guidelines
- Indicates the way in which compliance with the policy and its supporting standards, procedures and guidelines will be monitored and maintained

2.5.   The policy is reviewed at least once every two years and if appropriate amended to maintain its currency and relevance.

2.6.   Information is a corporate asset and the records of the Commission are important sources information in addition to administrative, fiscal, legal, evidential and historical information. They are vital to the Commission in its current and future work, for the purposes of accountability, and for an awareness and understanding of its history. They are the corporate memory of the Commission.

2.7.   In consultation with organisations that may be concerned with the management of its records, the Commission will create, use manage and destroy or preserve its records in accordance with all statutory requirements.

2.8.   Systematic records management is fundamental to organisational efficiency. It ensures that the correct information is;

(i)   Captured, stored, retrieved and destroyed or preserved according to need
(ii)   Fully utilised to meet current and future needs, and to support change
(iii) Accessible to those who need to make use of it
(iv) Supported by the appropriate technical, organisational and human resource elements to make this possible

2.9.   This is a specific part of the Commission's overall corporate programme and should be managed in accordance with relevant standards for records management such as ISO 15489, which provides an overall guide to best practice in records management.

3. Statutory Obligations

3.1.   As a public authority the Commission has obligations set out in the General Data Protection Regulations 2018 and under the Freedom of Information Act 2000.

4. Responsibilities

4.1.   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:

- **Senior Information Risk Owner (SIRO) –** The Secretary to the Commission (Accounting Officer) has overall accountability for records management and overall responsibility for managing records management risks.

- **Information Asset Owners (IAOs)** – Unit Heads are responsible for ensuring that their units have local procedures and guidance in place which comply with the records management policy and standards.

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

    All staff of the Commission who create, use, manage or dispose of records have a duty to protect them and to ensure that any information that they add to the record is necessary, accurate and complete. The confidentiality of individuals and key stakeholders records must always be of primary concern to Commission staff. All staff involved in managing records will receive the necessary training with regard to Commission records.

5. The Records Management System

5.1.   The system aims to ensure that;

(i)   The record is present - The Commission has the information that is needed to form a reconstruction of activities or transactions that have taken place.
(ii)   The record can be accessed - It is possible to locate and access the information and display it in a way consistent with initial use.
(iii) The record can be interpreted - It is possible to establish the context of the record: who created the document, during which business process, and how the record is related to other records.
(iv)   The record can be trusted - The record reliably represents the information that was actually used in or created by the business process, and its integrity and authenticity can be demonstrated.

(v) The record can be maintained through time - The qualities of accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed, perhaps permanently, despite changes of format.

6. Records Registration

6.1.   Records registration ensures a link between the record and its administrative roots. The registration of records will follow best practice in records management and allow for the users of the records to identify and track particular records and record collections. The registration system includes;

(i) Classifying of the records into series that have meaningful titles and a consistent reference code
(ii) Setting responsibility on individuals creating records to allocate them to an appropriate work area in the policy or case file series
(iii) Having sequences of reference numbers that can facilitate paper and electronic (where appropriate) records
(iv) Checking that the correct records have been allocated to the sequence and that meaningful titles are used
(v) Auditing lists of the references used so that the registration system makes sense and records can be found in appropriate search sequences

6.2.   Please see the Commission's File Plan at **Appendix A** for guidance.

7. Accountability

7.1.   The Secretary to the Commission has a duty to ensure that the Commission complies with the requirements of legislation affecting management of the records and with supporting regulations and codes.

7.2.   The Secretary to the Commission will work closely with the Information Commissioners Office and Public Records Office of Northern Ireland to ensure that there is consistency in the management of records and that advice and guidance on good records management practice is provided throughout the Commission.

7.3.   The Secretary to the Commission has delegated the Head of Corporate Services to be responsible for ensuring that records and information systems conform to this policy and to the requirements of legislation.

7.4.   All members of staff are responsible for documenting their actions and decisions in the records and for maintaining the records in accordance with good records management practice and professional guidelines.

8. Training

8.1.   All staff must be appropriately trained so that they can carry out their designated duties and responsibilities.

8.2.   Induction and other training will be ensure that all staff (including temporary members of staff) are aware of the Commission's records management policies, and understand their personal responsibilities.

8.3.   This will include training in the use of electronic records systems, and archiving, if appropriate

Information quality assurance

8.4.   In the context of records management and information quality, the Commission will ensure that staff are fully trained in record creation, use and maintenance, including having an understanding of:

- What they are recording and how it should be recorded
- Why they are recording it
- The need to differentiate fact from opinion and how to represent information supporting the opinion
- How to validate information with the patient, client or carers or against other records – to ensure that staff are recording the correct data
- How to identify and correct errors – so that staff know how to correct errors and how to report errors if they find them
- The use of information – so staff understand what the records are used for (and why timeliness, accuracy and completeness of recording is so important)
- How to update information and add information from other sources

9. Monitoring and compliance

9.1.   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.

10.   Policy review

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