

EXECUTIVE COUNCIL

PUBLIC

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Portfolio Holder:	MLA Roger Spink
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List of Documents:	Appendix 1 - Corporate Document & Records Management Policy

1. Recommendations

Honourable Members are recommended to approve:

- (a) Option 2. A Corporate Document & Records Management Policy for FIG.
- (b) Authorisation for the Director of Policy & Economic Development to make any amendments or minor updates to the policy, following discussion with Corporate Management Team (CMT).

2. Additional Budgetary Implications

2.1 None.

3. Executive Summary

- 3.1 A Corporate Document & Records Management Policy would be the administrative function of FIG to ensure that it securely keeps records required for business, regulatory, legal and accountability purposes.

- 3.2 The policy provides a framework on how FIG records are to be managed, and delivers staff with an overview of the procedures and legal obligations which apply to FIG records. The appendix within the policy sets out the responsible Department and Directorate for managing, storing and retaining the master copy of certain corporate records created by FIG. This has been created to reduce duplication and unnecessary storage of commonly held records.
- 3.3 The policy has been discussed with and presented to CMT. It has also been reviewed and supported by the Attorney General. The MLA portfolio holder for Government Services, Roger Spink, has been consulted and supports approval of the policy.
- 3.4 The resource implications of distributing the document to all staff employed by FIG, will be the time for FIG employees to familiarise themselves with the contents. Additional resource implications include training and support to be provided by the Policy Assistant, to support selected staff in the implementation of the policy within their relevant Departments.

4. Background

- 4.1 A Corporate Records Management Project has been launched by the Policy & Economic Development Directorate to improve how FIG manages and stores the records which it creates. Currently, due to the lack of any formal procedures in place, records in many Departments are being managed inefficiently and inconsistently, creating risks both with respect to fulfilling statutory obligations and also potential loss of valuable corporate knowledge.
- 4.2 A recent review of the current situation identified several weaknesses, including: storing records in unsuitable and unsecure offsite facilities; staff experiencing difficulties in retrieving/accessing files due to lack of information asset lists; irregular destruction of records due to lack of retention schedules; and deterioration of records.
- 4.3 While some Departments have implemented appropriate and secure records management, most have faced challenges due to lack of space, staff turnover and inconsistent corporate policies, particularly with respect to intermediate records.
- 4.4 In some cases, temporary storage solutions such as the use of containers creates a potential risk to both records and employee health and safety, from factors such as mould, lack of sufficient lighting etc.
- 4.5 The Corporate Document & Records Management Policy, addresses the root of the problem by informing staff of the basic procedures to be followed when managing records and providing an initial framework to improve records management across FIG.

- 4.6 The key features of the policy include: outlining the roles and responsibilities of staff and senior management; providing an overview of legal obligations surrounding records; outlining the procedures for managing records on a daily basis; and detailing associated documentation/guidance.
- 4.7 Support implementing and maintaining the new policy will be provided by the Policy Assistant.
- 4.8 The policy supports the Islands Plan 2018 - 2022 objectives of 'Self-determination and good governance', by supporting greater accountability and transparency for FIG.
- 4.9 The Records Retention ExCo paper 61/16, which updated procedures for retaining records within FIG, is supported and developed by this policy which provides further guidance.

5. Options and Reasons for Recommending Relevant Option

- 5.1 Option 1: Do nothing. This option would have no resource implications but would not support the development of records management, or provide support to staff on how to effectively manage corporate records.
- 5.2 Option 2: Approve and implement the policy. This option will demonstrate FIG's commitment to improving records management and providing the necessary support for staff managing their records.

6. Resource Implications

6.1 Financial Implications

None

6.2 Human Resource Implications

None.

6.3 Other Resource Implications

The only resource implication from approving and implementing this policy is the time required for staff to read through the document and familiarise themselves with the contents. The Policy Assistant will also be offering training for staff within Departments to ensure they understand the procedures outlined in the policy, and manage records in the appropriate manner.

7. Legal Implications

- 7.1 Legal implications relating to this policy are covered in the policy itself.

8. Environmental & Sustainability Implications

8.1 None.

9. Significant Risks

9.1 Rejecting the policy, and not providing guidance for staff, would lead to the continuation of records being poorly managed and, increase the risks being faced by FIG in terms of its accountability.

9.2 Further risks from rejecting this policy include the continued deterioration in the condition of the records themselves, and their storage facilities. This creates barriers in terms of accessing records when required, by not allowing staff to retrieve records when required and, poses great risk to staff. Many of the offsite storage facilities have limited visibility and therefore, coupled with the existence of mould on some records, pose significant risks to health and safety.

10. Consultation

10.1 All FIG Directorates will be included within the remit of the policy. Directors have been involved during the development and drafting process, and it has been presented formally to CMT.

10.2 The Attorney General has reviewed the legal obligations for managing records, as set out in this policy, and has supported and approved the document.

10.3 MLA Roger Spink, portfolio holder for Government Services, has been consulted and supports the policy.

10.4 Any future updates or small amendments to this policy will be brought to CMT, by the Director of Policy & Economic Development, for approval from Directors.

11. Communication

11.1 Once approved the policy will be distributed to Directors, Heads of Service, and PAs, by the Policy & Economic Development Directorate.

11.2 A copy will be placed on FIG's internal network by the administrator for all staff to access.

Corporate Document & Records Management Policy

September 2018

Version Number: 1.0



Policy & Economic Development Unit
Falkland Islands Government

Directorate

Policy & Economic Development

Publication Reference

Document Purpose	Guidance
Document Name	Corporate Document & Records Management Policy
Author	Chloe Anderson
Publication Date	
Target Audience	FIG Directors; FIG Heads of Service, All FIG Employees
Description	Advice on the process of classifying documents and records

Superseded Documents

Timing/Deadlines

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Document Status

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1 Introduction

- 1.1 All Falkland Islands Government (FIG) staff members must ensure that they are familiar with the contents of this policy, which outlines the standards of practice required in the management of Government corporate records. It is based on current legal requirements and professional best practice.
- 1.2 All organisations need to keep records, and the public would rightly expect that FIG maintains records on its activities and decisions that affect the social, economic and political development of the Islands.
- 1.3 Records and documents are different. A document is defined as the smallest unit of filing, and is often identifiable as it is a single letter, form or report. Records are the recorded evidence of policies and decisions created by FIG.
- 1.4 A record is defined as: information created, received and maintained as evidence and as an asset by an organisation or person, in pursuit of legal obligations or in the transaction of business (BS ISO 15489-1:2016).
- 1.5 A record can be in various formats including: paper; electronic; email; social media; videos and telephone messages.
- 1.6 Records are important information assets to all organisations. Information is most valuable when it is up to date, accessible and accurate. Effective records management ensures that information is properly managed and available, in whatever format it is stored.
- 1.7 Records management is the field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records. By having frameworks in place, which provide evidence of actions and decisions taken, it ensures that FIG remains accountable and transparent, and that this information remains available for reference and use when required.
- 1.8 A record retention schedule is a controlled document which sets out the length of time records are retained for before final disposal action is taken (secure destruction or transfer to the Jane Cameron National Archives for permanent preservation). It applies to all information regardless of format upon which it was created or held. All staff should be familiar with their Department's retention schedule and apply the relevant retention period to the records.
- 1.9 A Corporate Document and Records Management Policy is essential to supporting and providing effective management of records. It will ensure that FIG securely keeps the records it needs for business, regulatory, legal and accountability purposes.

1.10 The purpose of this policy is to provide a framework on how FIG records are to be managed, and to provide staff with an overview of the procedures and legal obligations which apply to FIG records.

2 Background

2.1 FIG will take actions as necessary to comply with legal and professional obligations set out for records, and in particular:

- Access to Health Records Ordinance 1995
 - Committees (Public Access) 2012 Ordinance
 - Falkland Islands Government Access to Information Code of Practice 2016
 - Falkland Islands Financial Instructions
 - Falkland Islands Government Management Code
 - Falkland Islands Government Corporate Records Retention Policy
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- a. Access to Health Records Ordinance 1995 sets out the right to access health records of individuals to whom they relate and other persons, and to provide for the correction of inaccurate health records.
 - b. Committees (Public Access) 2012 Ordinance provides members of public the right to attend meetings and have access to relevant documents of certain committees. It also outlines the limitations to this access and restrictions which apply.
 - c. Falkland Islands Government Access to Information Code of Practice 2016, states the decisions and procedures for providing access to information and responding to requests; including procedures for accessing an individual's personal information held by FIG. This Code only applies to the FIG and other public bodies that FIG controls.
 - d. The Falkland Islands Financial Instructions, updated annually, describes the roles and responsibilities for all officers concerned with finance, including the procedures for preparation of estimates; collection of revenue; payment of expenditure and maintenance of accounting records. The document also specifies the retention period for financial records retained by any FIG Directorate.
 - e. Falkland Islands Government Management Code provides guidance on staff procedures and behaviour in regards to records created through employment, and disclosure of information. It also outlines disciplinary actions for staff that do not follow the code of conduct. This Code applies to all FIG employees.
 - f. Falkland Islands Government Corporate Records Retention Policy, approved by ExCo in 2016, provides basic guidelines on retention periods for certain types of records.

2.2 Further documentation which can be used as guidance for records includes:

- BS ISO 15489-1: 2016 Information and Documentation - Records Management
- Data Protection Act 2018
 - a. BS ISO 15489-1: 2016 Information and Documentation - Records Management, outlines the core concepts and principles for the creation, capture and management of records. It includes general details on: records control; records and record systems; policies and assigned responsibilities; appraisal; and processing records through stages of creation, capture and management. Though compliance with British Standards is voluntary, this document and its principles are set as an aspiration for FIG to work towards complying with.
 - b. The Data Protection Act 2018 is an Act of UK Parliament which regulates the processing of personal data relating to living individuals, including the obtaining, holding, use or disclosure of such information. In May 2018 the Act was passed by Parliament to repeal the previous Data Protection 1998 Act, to provide tighter controls on the management of personal data; including destruction and access to individual's information. Though this Act is not in force in the Islands, and the previous Data Protection Ordinance repealed in 2012, it is listed as a matter of best practice until appropriate legislation is approved by Legislative Assembly.

2.3 Failure to comply with the above regulations could result in reputational damage for FIG, and where relevant, legal action. This policy applies to all FIG employees and must be strictly observed.

3 Scope

- 3.1 Staff members of all FIG Directorates and Departments are within the scope of this policy.
- 3.2 Health and Social Services Directorate can also find guidance from NHS England, which sets out relevant frameworks and documentation on the management of health records.
- 3.3 This policy is also for any staff working in or on behalf of FIG – including contract workers, temporary/casual staff, or honorary appointees.

4 Roles and Responsibilities

- 4.1 The Chief Executive through the Directors is accountable for the Records Management within FIG.
- 4.2 Directors are responsible for ensuring that the Directorate they are responsible for is managed in accordance with this policy and also for maintaining adequate records within the context, both legal and regulatory, of the business area their FIG Directorate operates.
- 4.3 The Director of Policy & Economic Development has lead responsibility for records management and maintaining this policy as an active document within FIG Departments.
- 4.4 The Policy Assistant has operational responsibility for the Document and Records Management Policy.
- 4.5 In the absence of a Records Manager, the Policy Assistant is also responsible for supporting a culture of high quality records management practise across FIG.
- 4.6 The Heads of Service and Office Managers for each Directorate are responsible for ensuring that records created by their respective FIG Directorates are stored securely and that access to them is controlled.
- 4.7 All staff members are responsible for keeping a record of business transactions or evidence of actions conducted as part of their duties for FIG. The record should be stored appropriately, a retention period assigned and access controls applied if necessary.

5 Corporate Level Procedures

- 5.1 This policy covers the management of both documents and records in FIG. The policy sets in place the strategic governance arrangements for all documents and records produced and received by FIG in accordance with agreed best practice as well as the principles established in BS ISO 15489 (International Standard for Records Management).
- 5.2 This policy is mandatory and applies to all information in all formats. It covers all stages within the information lifecycle including: creation; use; documents appraisal; declaration of record; record appraisal; retention and disposition.
- 5.3 Staff members must not alter, deface, block, erase, destroy or conceal records with the intention of preventing disclosure of information.
- 5.4 Staff members are expected to manage records about individuals in accordance with this policy irrespective of their race, disability, gender, age, sexual orientation, religion or belief, or socio-economic status.

5.5 Lifecycle Management

- 5.5.1 Records management plays a crucial role within FIG as it underpins effective information sharing with Government Directorates and externally to the public. The law requires that certain records are retained for a defined period however; records are used on a daily basis for internal purposes.

➤ Step 1: Creation

This is the start to the cycle - when pen is put on paper, an entry is made onto a database or a new electronic document is opened. It can be created by employees within FIG or received from an external source. It must be complete, reliable, authentic, integral and useable.

➤ Distribution

This stage is focused on managing information once it has been completed or received. It occurs when a record has been sent to someone for whom it was intended. Distribution includes: photocopy; photography; receiving by registered mail or by hand; receiving through email or email attachment.

➤ Step 3: Use

This is when records are actively used to support organisational decisions and transactions. The records are labelled as current or active.

➤ Step 4: Storage & Maintenance

At this stage records are not used on a regular basis and are being kept for legal or financial reasons until the retention period is complete. The storage and

maintenance phase includes: filing; transfers; and retrieval. Records still remain accessible and can be used as points of reference to support decisions however; they should not be removed from the records management system. Records in this stage are known as semi current, or inactive.

➤ Step 5: Disposal

This stage is where the records are no longer needed for current business, have reached their retention period or have no continuing value. During this stage the records are reviewed to assess whether the record will be securely destroyed or, if it is of enduring/historical value, transferred to the Jane Cameron National Archives. This is the final stage of the Lifecycle.

5.6 Records Retention Schedule

- 5.6.1 Keeping unnecessary records wastes time, uses up valuable storage space and potentially incurs costs. In accordance with best practice and retention schedules records are not to be kept past the specified retention period.
- 5.6.2 Records should only be destroyed in line with Directorate's retention schedules. FIG therefore, needs to demonstrate that the destruction of records is in line with proper retention procedures.
- 5.6.3 The specified retention periods apply to the official or master copy of the records. Any duplicates which may be held in other Departments should be identified and kept for as short a period as possible.
- 5.6.4 Some types of records which may be created and kept locally are the responsibility of the local Department, but may be found under a different function on the retention schedule.
- 5.6.5 The Corporate Record Retention Policy and advice from the Jane Cameron National Archives is available for guidance for staff.
- 5.6.6 Appendix 1 provides list of FIG offices, and their corresponding Directorate, responsible for retaining and managing the master copy of certain records.

5.7 Records Involved in Investigations, Litigation and Legal Holds

- 5.7.1 A legal hold, or litigation hold, requires employees to preserve and not destroy, or modify, records and information that are relevant to a pending or current lawsuit. This includes records on paper and electronic format.
- 5.7.2 Legal hold will be decided by the Director of the relevant Directorate, in line with the Management Code.
- 5.7.3 Once the period of legal, or litigation, hold is complete records are retained in accordance with the appropriate retention schedule. Any records which have subsequently reached the end of their retention period can go through the relevant disposal process.

5.8 Record Naming and Good Practice

- 5.8.1 Record naming is an important process in records management. In the absence of a formal FIG Naming Convention document, it is essential that where possible a unified approach is undertaken within FIG Directorates when naming/referencing records.
- 5.8.2 Staff should refrain from naming folders or files with their own name unless the folder contains biographical files and are about that individual.

- 5.8.3 Version control is the management of multiple revisions to the same document. Version control enables us to tell one version of a document from another. It is important that records which require version control include details on: the updates which have been completed; the date it was updated; the author who amended it; and where relevant the date of review.
- 5.8.4 Primary electronic records, when possible, must be held within accessible shared drives rather than individual drives. This is to ensure that information remains accessible even when the owner is absent.

5.9 Record Maintenance

- 5.9.1 At present there is no interim storage area for paper records once they reach semi current stage.
- 5.9.2 The movement and location of paper records should be controlled to ensure that a record can easily be retrieved at any time. This will ensure that the original record can be traced and located if it is required.
- 5.9.3 Storage areas for paper records should be secure, and be in line with fire regulations. The conditions should provide an environment with minimum fluctuations in temperature and humidity, and ensure records remain dry and free from biological, external elements like rain.
- 5.9.4 Electronic records should be saved on shared drives if access is permitted, which have regular back-ups undertaken (See 5.8.4).

5.10 Record Access

- 5.10.1 FIG Access to Information Code of Practice sets out provisions for accessing information held by FIG and responding to requests. It also sets out provisions to provide individuals with the right to access information that FIG holds about them.
- 5.10.2 The FIG Information Systems Acceptable Usage Policy supports the protection of personal data and sets out the procedures for limiting unlawful access and disclosure of information, and the unauthorised holding of processing of personal data on FIG computers or private devices.

5.11 Record Closure

- 5.11.1 Current records should be closed when they become inactive and are no longer being actively used to support organisational decisions and transactions. These records then become semi-current/intermediate records and are retained until disposal

5.11.2 The Corporate Record Retention Policy and advice from the Jane Cameron National Archives, which is available on Public Folders, provides guidance on applying timescales and ensuring that records are not kept for longer than necessary.

5.12 Record Appraisal

5.12.1 Appraisal refers to the process by which a Directorate identifies whether a record is worthy of permanent preservation and sent to the Jane Cameron National Archives.

5.12.2 The purpose of appraisal is to ensure records are examined at the appropriate time to examine whether or not they are worthy of archival preservation, or should be securely destroyed.

5.12.3 Appraisal should only be undertaken after consultation with the National Archivist.

5.13 Record Transfer

5.13.1 Records which are no longer active are selected for archival preservation and should be transferred to the Jane Cameron National Archives. This must be authorised by the National Archivist to ensure there is adequate storage for the records.

5.14 Record Disposal

5.14.1 Disposal is the implementation of appraisal and review decisions. It is not the same as destruction; though records may be selected for secure destruction they may also have custody transferred to the Jane Cameron National Archives.

5.14.2 Records should not be kept for longer than retention periods and should be disposed of once the disposal process is complete.

5.14.3 Accounts of staff members who have left employment with FIG will be deleted immediately unless there are extenuating circumstances. This will utilise server space and ensure that records are not held in excess of their retention period.

5.14.4 Short lived documents which are not essential correspondence, such as telephone messages, notes on pads, post-its, do not need to be kept as records. If they are business critical, where appropriate, they should be transferred to a more formal document which should be saved as a record.

- 5.14.5 For reasons such as efficiency and to address problems of storage space, staff may undertake scanning of paper records into electronic format. However, due to the nature of scanning this process should be well considered, and where appropriate, discussed with Director before continuing.
- 5.14.6 Staff involved in scanning paper records into electronic format with the purpose of discarding the original, should be aware of the retention details of the particular record and if necessary get advice from the National Archivist.

5.15 Records Security

- 5.15.1 All FIG staff with identifiable data or commercially sensitive data must save it with the appropriate security measures (for example Restricting Editing).
- 5.15.2 Staff should not use home email accounts or private computers to hold or store sensitive records or information which relates to business activities of FIG.
- 5.15.3 When printing paper records, in particular sensitive documents, staff must ensure that measures are taken to collect material once it has been sent to the printer.
- 5.15.4 Never leave your computer logged on when unattended. It should be locked and secure.
- 5.15.5 Information Systems Acceptable Use Policy provides further guidance on security for electronically held records.
- 5.15.6 For confidential or sensitive records ensure that there are controls in place for only authorised staff members to access records, and that retrieval is monitored.
- 5.15.7 Records should be secured in locked storage facilities, such as filing cabinets, to further control access.

6 Distribution and Implementation

- 6.1 This document will be made available to all staff via the FIG Public Folders and made available to new staff at FIG Induction sessions.
- 6.2 A notice will be sent to all Directors, Heads of Service and PAs informing them of the documents release.

7 Associated Documentation

7.1 The following documents, available on Public Folders, will provide additional information:

Title	Version
FIG Corporate Record Retention Policy	2016 Edition
Falkland Islands Government Access to Information Code of Practice	2016 Edition
Falkland Islands Financial Instructions	2016 Edition
Information Systems Acceptable Use Policy	2015 Edition
FIG Management Code	2003 Edition
Retention of Government Records – Advice from Archives	2003 Edition

7.2 Further information and authoritative updates on the below listed legislative obligations can be found on the Falkland Islands Legislation website: <https://www.legislation.gov.fk/>

- Committees (Public Access) 2012 Ordinance

- 7.3 Policy Assistant holds the paper version of BS ISO 15489 Standard for Records Management.

8 Version Control Tracker

- 8.1 Version control information is as follows:

Version Number	Date	Author Title	Status	Comment/Reason for Issue
1.0		Policy Assistant	Unapproved	New Policy

- 8.2 The Policy & Economic Development Unit is responsible for overseeing and updating the version control amendments for this document.

9 Appendices

Appendix 1: Corporate Records Master Copy List

The below table sets out the responsible Department and Directorate for managing, storing and retaining the master copy of certain corporate records created by FIG.

If these documents are held by other Directorates they are classified as duplicates, and not the official version.

Name of Record	Responsible Department	Responsible Directorate
Standing Finance Committee Papers & Minutes	Treasury	Financial Secretary
Executive Council Papers & Minutes	Legislature	Chief Executive's Office
Corporate Management Team Papers & Minutes	Chief Executive's Office	Chief Executive's Office
Strategic Oil Group Papers & Minutes	Chief Executive's Office	Chief Executive's Office
Legislative Assembly Papers & Minutes	Legislature	Chief Executive's Office

Environmental Committee Papers & Minutes	Policy & Economic Development	Policy & Economic Development
Historic Building Committee Papers & Minutes	Planning & Building Services	Development & Commercial Services
Public Accounts Committee Papers & Minutes	Treasury	Financial Secretary
Fisheries Committee Papers & Minutes	Fisheries	Natural Resources
Planning & Buildings Committee	Planning & Building Services	Development & Commercial Services
FIG Contracts & Tenders	Contracts, Tenders & Major Projects	Development & Commercial Services
Land Sales & Deeds	Registry	Attorney General's Chambers
Legislation Records	Legal Services	Attorney General's Chambers
Lands Committee Papers & Minutes	Legal Services	Attorney General's Chambers
FIG Statutory Appointment records	Legislature	Chief Executive's Office
FIG Staff/Personnel Records – including signed contracts, payroll, P Files.	Human Resources	Human Resources
Education Board Committee Papers & Minutes	Director of Education Admin	Education

Police Committee Papers & Minutes	Emergency Services Admin	Emergency Services & Islands Security
Mineral Resources Committee Papers & Minutes	Mineral Resources	Mineral Resources
Building & Planning Applications	Planning & Building Services	Development & Commercial Services
Falkland Islands Gazettes & Supplements	Legal Services	Attorney General's Chambers
Immigration Applications and Customs records	Customs & Immigration	Emergency Services & Islands Security
Housing Committee Papers & Minutes	Public Works Admin	Public Works
FIG Housing Tenancy Agreements	Public Works Admin	Public Works
FIG Press Releases	Policy & Economic Development	Policy & Economic Development
Census Reports	Policy & Economic Development	Policy & Economic Development
FIG Economic Development Policies	Policy & Economic Development	Policy & Economic Development

