

# RECORDS MANGEMENT POLICY

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## 1 Purpose

This document sets out the Royal Borough-wide policy for information quality and records management to which all staff should adhere. The policy demonstrates that managing records is important to the organisation and provides a framework for developing supporting procedures. It provides a statement of intent for a records management programme and serves as a mandate for improvement.

This records management policy should be read in conjunction with the '*Greenwich Overarching Information Governance and Security Policy Framework*'.

## 2 Records Management

### 2.1 Defining Records Management

Any evidence of the Royal Borough's business activity is a record. Examples of records include paper documents, electronic files, emails, databases, maps or images. Keeping records and managing them appropriately in a way that meets the Royal Borough's legal obligations is the responsibility of all staff.

### 2.2 Corporate memory and corporate asset

Records are the Royal Borough's corporate memory and provide the evidence of the Royal Borough's business actions and decisions. They also provide evidence that the Royal Borough has satisfied statutory requirements. Well managed records can improve the process of decision-making and facilitate business administration. They are, therefore, a corporate asset.

### 2.3 Why should we try to manage records?

Modern technology has enabled staff to operate efficiently and quickly, but has brought with it the capacity to create huge amounts of data, often without the controls that were in place in more traditional ways of operating. Records Management is the process of having a consistent approach to the way the Royal Borough manages all aspects of the lifecycle of the records the Royal Borough creates, from creation to disposal or reuse.

Improving records management, or, indeed, setting in place management where it does not yet exist, depends on how well the business processes are understood and managed in service areas. Understanding the business processes also enables a review of those activities and transactions which ought to be creating records to set a standard, and highlights for improvement where they are not.

This Records Management Policy sets out the overall approach to embed good governance arrangements around the management of our information processes, people and systems. The aim is to do this in a way that can be recognised in terms of international standards, e.g., to move towards the international standard for records management, ISO 15489.

## 2.4 What is a record?

A record is a piece of information that has an intrinsic worth which makes it important enough to save and keep secure for its evidential value. In order to decide whether a piece of information is a record or not, its business context must be understood as well as its relevance and significance to the organisation. A record is any information created, received and maintained as evidence of Council activity or transactions. For instances when a transaction does not automatically produce a record, it becomes necessary to create one manually. This highlights the value of good records management and understanding which records ought to be created and held as well as the importance of checking that the records are of a good enough quality.

## 2.5 Which records are we most concerned about?

The Royal Borough has many legal duties, which can be broadly described as local authority functions. Within each function the Royal Borough has staff undertaking business processes to deliver their work. In the course of these business process activities records are created and need to be managed. These are the main records that the Royal Borough is concerned about managing.

## 2.6 Data quality – what makes a good record?

If a record is to be of value as evidence of business activity, it is important that it be judged by a set of criteria, sometimes known as ‘dimensions’ in good-practice documentation. To judge the quality of a record, one must take into consideration:

- **Completeness** – What is the proportion of information contained in the record against the potential of “100% complete”? A record of a school would not be complete if, for example, it didn’t indicate whether the school was primary or secondary.
- **Uniqueness** – No individual thing will be recorded more than once, based on how that particular thing is identified. A single record should, in other words, be discrete and identifiable as itself, rather than occurring multiple times in a single dataset. A dataset of individual trees should not have one entry that pertains to any particular tree.
- **Timeliness** – The degree to which the record represents reality at the particular moment it was created. A customer’s profile from ten years ago should not be the sole consideration for determining their eligibility for housing at this particular moment in time.
- **Validity** – Whether or not a record is in a format or syntax that conforms to its definition. Council payments are recorded in pounds, rather than in degrees Celsius, for example
- **Accuracy** – The record should correctly describe the “real world” object or event. A record pertaining to a school that is currently in use should not describe it as demolished. In addition, it is important to take into account whether a record is reasonable and representative, considering the particular type of record. For example, one should be skeptical of a child’s record that indicates an age of 47.
- **Consistency** – A record of a particular object should be recorded in the same way on different occasions. A single customer’s record describing J Smith, Jon Smith, Jonathan Smith and John Smythe would not be consistent.

- Relevance – A records should relate to others in its particular collection of information, or dataset. For example, a list of clients for a Council department should not include a record for a tree.

## 2.7 What is out of scope?

All business activities that deliver the Royal Borough's functions are within the scope of this policy. It is still important, however, that non-records are actively managed so that they can be easily retrieved and disposed of as soon as they are no longer required.

Out-of-scope of this policy include the following:

- Reproduced documents kept for supply purposes where master copies have been retained already;
- Books, periodicals, newspapers being kept for reference purposes;
- Duplicate copies of documents kept for convenience; and
- Personal materials, which have no relation to official duties.

# 3 The Policy

## 3.1 Overview

This section comprises the core policy statements and commitments that the Royal Borough has made with regard to this policy. Each of these sections is then described in more detail further on in this policy document.

## 3.2 There are clear roles and responsibilities in place

There will be a specific corporate board responsible for records management. These are set out in the *Greenwich Overarching Information Governance and Security Policy Framework*.

## 3.3 The Royal Borough has adopted records lifecycle standards

The records management standards are listed and numbered for ease of use. These are set out in the section Records Management Standards.

## 3.4 The Royal Borough complies with relevant legislation

This is set out in the section Legislation.

## 3.5 Records are classified in a sensible and repeatable manner

An important element of records management is classification. ISO 15489, for example, defines classification as the “systematic identification and arrangement of business activities and/or records into categories according to logically structured conventions, methods, and procedural rules represented in a classification system”. In this model classification is concerned with providing the business context for a record.

## 3.6 An Information Asset Register (IAR) will be maintained for Royal Borough records

Implementing and maintaining an effective records management service depends on knowledge

of what records are held, where they are stored, who manages them, in what format(s) they are made accessible, and their relationship to organisational functions (for example finance, estates, IT, social care). An Information Asset Register (IAR) is essential to meeting this requirement. The IAR will also help to enhance control over the records, and provide valuable data for developing records appraisal and disposal policies and procedures.

This is described in the section [Information Asset Register](#).

### **3.7 There will be a corporate Electronic Document and Records Management System (EDRMS)**

There are many different systems supporting the business activities that staff undertake to deliver their work. These are all, by definition, records management systems, sometimes referred to as Line of Business Systems.

However, in some cases there are no systems and the records that are produced are often stored in a less consistent manner, which can make them difficult to use or find again in the future.

The Royal Borough is moving forward with a corporate EDRMS solution. This will complement existing systems that already have their own methods of records storage and will be rolled out as systems are replaced and in those areas where there not currently any records management systems in use.

The EDRMS solution will play a central role in allowing records to be properly managed and accessed, where needed and appropriate, from across the organisation.

## **4 Records Management Standards**

### **4.1 Creating records**

- Each service area must have in place a process for identifying the records required for all of its business activities, taking into account the legal duties under which it operates.
- Each service area must have written procedures in place to ensure that full and accurate records are created. This should include: what records to keep; where to keep them; who should keep them; and when to keep them.
- Each service area will ensure that all staff are trained so that they are clear about their responsibilities to create and manage records.
- Where possible business process maps will be produced and kept up-to-date by the service area to reflect these business activities.
- All staff operating in a Royal Borough service are responsible for creating a full and accurate record to support the activities in which they are involved.
- Unnecessary duplicate copies of records will not be created.
- Information on the intended disposal of electronic records must be included in the metadata when the record is created.

### **4.2 Scanning**

- As part of the EDRMS solution, all scanning of textual documents will make use of Optical Character Recognition (OCR) software, which will allow it to be searchable

as text.

- Scanned version of paper records will need to be of sufficient quality where they are searchable in digital form as well as properly indexed within the EDRMS solution, to allow the paper copies to be disposed of after.

### **4.3 Record keeping systems**

- Each service area will ensure that records are created and maintained in a structured filing system that will enable the Royal Borough to easily and quickly retrieve these records. This does not have to be software.
- Any records where there is a known business or legal requirement to keep evidence of the record must use a record keeping system. This includes any records, which by their nature or format are unstructured.
- Paper and electronic record keeping systems should contain descriptive and technical documentation to enable the system to be operated efficiently and the records held in the system to be understood.
- Procedures for using the system should be documented and enforced.
- Users should be trained to understand the system and follow procedures.
- Record keeping systems should enable the records to be classified according to the business functions and activities of the Royal Borough.
- The record keeping system must contain information pertaining to the retention period of the records.
- There should be clear procedures of how to access records that have reached or passed their retention date.
- All records stored in a record keeping system should have appropriate metadata, i.e., information about the record so that it can be easily found and understood (e.g., subject, title, date created, format). These will comply with the minimum metadata requirements for all paper and electronic records (see Appendices).
- Record titles should accurately reflect document contents, be brief and simple, yet specific and meaningful.
- Records should have version control on the record where appropriate (e.g., reports and policies).
- Record keeping systems should be reviewed and updated, as necessary, to continue to meet business needs and legislative standards.

### **4.4 Access and security**

- Appropriate access controls should be in place to ensure that only those who are entitled to access a record are able to.
- Physical movement of records must be tracked.
- All other system access controls will be undertaken in accordance with the Royal Borough's *ICT Access Policy*.

### **4.5 Storing and maintaining records**

- All service areas will store their business records in an appropriate way to maintain a high level of quality (i.e., they can be easily retrieved, are authentic, reliable, have



integrity, context and structure).

- All paper records should be kept in a secure location (i.e., a locked room or cupboard, when on premises, or stored via the Council's designated archiving solution when off-site).
- Storage accommodation for current records should be clean and tidy, should prevent damage to the records and should provide a safe working environment for staff.
- All service managers should review storage arrangements to ensure they are still appropriate; this includes paper and electronic records.
- The movement and location of records should be controlled to ensure that a record can be easily retrieved at any time, that any outstanding issues can be dealt with, and that there is an auditable trail of record transactions.
- Equipment used to store current records on all types of media should provide storage that is safe and secure from unauthorised access and which meets health and safety and fire regulations, but which will also allow maximum accessibility of the information commensurate with its frequency of use.
- Procedures for handling records must take full account of the need to preserve important information and keep it confidential and secure.

#### **4.6 Storing records offsite**

- The default format for archiving and storing records should be digital. Only those records which cannot be stored digitally, or which must be kept in analogue form for an agreed reason, will be stored in the designated offsite location.
- All records that are kept offsite will be managed according to agreed corporate standards and kept according to agreed periods in the retention schedule in the designated location arranged by the Council.

#### **4.7 Backup and Business continuity**

- All service managers must ensure that they understand the back-up procedures around their record keeping systems so that they are fully aware of how these records are being stored in the longer term.
- For records in digital format, maintenance in terms of back-up and planned migration to new platforms should be designed and scheduled to ensure continuing access to readable information. A regular test of this ability, in the form of a Disaster Recovery (DR) exercise, should be arranged and monitored.
- A contingency or business continuity plan should be in place to provide protection for all types of records that are vital to the continued functioning of the organisation. Key expertise in relation to environmental hazards, assessment of risk, business continuity and other considerations is likely to rest with information security staff and their advice should be sought on these matters.

#### **4.8 Records closure**

- Records should be closed as soon as they have ceased to be in active use, according to standards set by the respective service areas within the Council.
- An indication that the record has been closed should be shown on the record itself.

- An indication that a file of paper records or folder of electronic records has been closed, together with the date of closure, should be shown on the record itself as well as noted in the index or database of the files/folders.

#### **4.9 Monitoring Retention**

- Service areas must take responsibility to ensure that their area's business records are retained according to the records retention policy and where unclear should consult the [Local Government Guidelines](#).
- Service areas will have in place a process of reviewing whether records can be destroyed, warrant an extension to their retention period or are worthy of permanent archival preservation.
- All staff are responsible for identifying changes to legislation that may impact on retention requirements.
- Records deemed 'non-sensitive' (e.g., not containing personal or other confidential information), selected for archival preservation and no longer in regular use by the organisation should be transferred as soon as possible to an archival institution.
- Non-active records should be transferred no later than 30 years from creation of the record, as required by the Public Records Act.

#### **4.10 Disposing of records**

- Managers must ensure that the retention policies appropriate to their business records are implemented and should implement destruction procedures to routinely weed through and identify records due for disposal.
- Records (including copies) not selected for archival preservation and which have reached the end of their administrative life should be destroyed in as secure a manner as is appropriate to the level of confidentiality or protective markings they bear.
- Any divergence from the disposal schedules requires liaison with the corporate Knowledge and Information Manager.
- The act of disposing of a record should be carried out in a clearly articulated and documented process, according to an annual schedule and pre-defined criteria, in order to justify why the records in question were destroyed and proving beyond refute that no trace of them remains. This will also reduce the chances of either valuable records being destroyed in error, or the wrong records retained.
- All service areas must have procedures in place for recording the disposal decisions made following appraisal. An assessment of the volume and nature of records due for appraisal, the time taken to appraise records, and the risks associated with destruction or delay in appraisal will provide information to support an organisation's resource planning and workflow.
- Service areas will ensure that confidentiality is safeguarded at every stage of the lifecycle of the record, including destruction, and that the method used to destroy such records is fully effective and ensures their complete illegibility.
- Where third party contractors have been used to dispose of records, they must be required to sign confidentiality undertakings and to produce written certification as proof of destruction.

- A record of the destruction of records, showing their reference, description and date of destruction should be maintained and preserved by the service area. Disposal schedules would constitute the basis of such a record.
- If a record due for destruction is known to be the subject of a request for information, or potential legal action, destruction should be delayed until disclosure has taken place or, if the authority has decided not to disclose the information, until the complaint and appeal provisions of the Freedom of Information Act have been exhausted or the legal process completed.

## **5 Legislation**

### **5.1 Overview**

The Royal Borough is committed to continuously improving the way it responds to requests for information under statutory access regimes, including the Freedom of Information Act (2000), the GDPR and Data Protection Act (2018), and the Environmental Information Regulations (2004). Compliance, however, is reliant upon proper management of the Royal Borough's information, which needs to be managed, secure and easily located. The Royal Borough regards all identifiable personal information relating to residents as confidential and all identifiable information relating to staff as confidential (except where national policy on accountability and openness requires otherwise). The Royal Borough complies with the GDPR and Data Protection Act 2018, the Freedom of Information Act 2000 and the common law of confidentiality.

### **5.2 Freedom of Information**

The Freedom of Information Act 2000 (FOIA) together with the Environmental Information Regulations 2004 (EIR) provides the public a general right of access to information held by the Royal Borough. When a written request for information is made, the Royal Borough must provide a response within 20 working days. If the Royal Borough holds any record of the information on any record system (even backup systems and off-site storage archives) then the Royal Borough must either provide the requestor with the information or must state which exemption has been applied. Delivering this right of access efficiently to the public can only be achieved with efficient, well managed records management systems.

### **5.3 Lord Chancellor's Code of Practice for Records Management**

The Lord Chancellor published a Code of Practice for records management in 2002 (revised in 2009) as a supplement to the Freedom of Information Act (mentioned above) that all public bodies should follow. Section 7 states that 'Authorities should have in place a records management policy, either as a separate policy or part of a wider information or knowledge management policy.'

### **5.4 Environmental Information Regulations**

From 2005, the Royal Borough of Greenwich has been legally bound to deal with requests for information that are covered by the Environmental Information Regulations (EIR).

Environmental information covers information on the state of the environment, such as air,

water, soil, land, flora and fauna and diversity and will also include information on genetically modified organisms. In addition, information on emissions and discharges, noise, energy, radiation, waste and other such substances; measures and activities such as policies, plans and agreements; reports, cost benefit and economic analyses are included. The state of human health and safety, contamination of the food chain; cultural sites and built structures as they may be affected by environmental factors, will also be considered environmental information. The Environmental Information Regulations are aligned with Freedom of Information in many ways. Therefore, at Greenwich, both sets of regulations are dealt with under the same process. For both, a response to all requests for information must be provided within 20 working days. Information can only be withheld when allowed (or required) to do so by specific exceptions granted to us by law.

## **5.5 General Data Protection Regulations (GDPR) and the Data Protection Act (2018)**

The Royal Borough of Greenwich needs to collect personal information about people with whom it deals, in order to carry out its business and provide its services. Such people include customers, employees (present, past and prospective), suppliers and other business contacts.

The Data Protection Act 1998 remained largely unchanged since the start of the millennium. The EU's General Data Protection Regulation (GDPR) and a new Data Protection Act 2018 have applied since 25 May 2018, when they superseded the UK Data Protection Act 1998. The definition of personal data was expanded to reflect the importance of individual's online interaction. In particular, online identifiers, device identifiers, cookie IDs and IP addresses are now all expressly included in the definition of personal data. It expanded the rights of individuals to control how their personal information is collected and processed, and placed a range of new obligations on organisations to be more accountable for data protection.

The Royal Borough maintains a *Data Protection Policy*, which sets out what an individual's rights are and explains the process for obtaining personal information. The policy sets out the principles and describes the processes around obtaining personal information in terms of the act. The Data Protection process around completing Subject Access Request forms are available on the public [website](#).

## **5.6 Local Government (Records) Act 1962**

The Local Government (Records) Act 1962 gave local authorities limited discretionary powers to hold their records in local archives. In particular the Act states that: 'A local authority may do all such things as appear to it necessary or expedient for enabling adequate use to be made of records under its control'.

## **5.7 Local Government Act 1972**

The Local Government Act 1972 set out the basic requirement for local authorities to 'make proper arrangements' to keep good records.

## 6 Classification and Retention

### 6.1 Classification Scheme

Classification is defined, under ISO 15489, as the ‘systematic identification and arrangement of business activities and/or records into categories according to logically structured conventions, methods and procedural rules represented in a classification system’.

A classification scheme is a logical framework for organising information and applying policies to that information. There are five main reasons for using a classification scheme:

- Information can be grouped together to provide context. A single record on its own provides limited information. A group of related records will supply a bigger picture.
- A system of classification can be used to organise storage.
- Classification can be used to apply information security policies and access controls.
- Classification can be used to apply retention and disposal policies.
- Finally, proper classification can be used to browse for information. Browsing is distinct from searching. Searching requires some knowledge of what you are looking for. Browsing is more like going into a library and deciding what type of book you would like to read. By navigating a classification scheme it is possible to “home in” on the information you are looking for. Finding information efficiently can require a combination of browsing and searching.

### 6.2 Classification in the EDRMS solution

Optical Character Recognition (OCR) technology, being used in the EDRMS solution, allows scanned and other digital records to be searched for keywords or other indicators, which greatly reduces the need to manually classify records. Each ‘library’ (storage area for a particular system or area of the Council) will be designated in the simplest and most logical fashion, taking into account particular needs of the subject area in question. An individual user will only need to classify a record according to the most basic, top-level indicators (e.g., sensitive vs non-sensitive and a person’s employee number) to allow the record to be categorised correctly and easily retrievable at a later date. This function will develop as the EDRMS solution continues to be rolled out across service areas.

### 6.3 Retention schedule

The retention schedule sets how long records need to be stored before we can or should destroy them. The Royal Borough’s retention schedule is built on the retention periods given in the [Local Government Classification Scheme](#) (LGCS), amended to reflect needs of individual service areas. Changes to these retention periods, where required, will be approved between service areas and the Knowledge and Information Manager.

It is important that records are kept for as long as their contents have operational value and for as long as they may be required as evidence of the transactions they document. However, there are often also compelling reasons not to retain such records for any longer than they are required relating to costs of storage, pressures on physical space and the need to disclose all relevant information held in response to an FOI request or legal discovery exercise.

The retention schedule will provide the basis for the decision-making process, but it should be

noted that the schedule only defines minimum retention periods. The situation for individual records should be taken into account (for example, any record which is the subject of an ongoing FOI request should not be destroyed, even if due for destruction according to the retention schedule).

## **7 Data audits and the Information Asset Register (IAR)**

### **7.1 Undertaking audits of business data**

The Royal Borough holds data on many different systems, with each dataset collected and used to deliver specific services. The quality of the services we provide and the business decisions that get taken often depend on the accuracy of this data. In order to determine a mechanism for routinely and consistently reviewing the state of the Royal Borough's data, the Royal Borough will undertake data audits. Data auditing is the process of conducting a survey to assess whether the Royal Borough's data is fit for a given purpose – by examining and reviewing business processes and the data recorded in those processes. Initially, reflecting the requirements of the GDPR, auditing will focus primarily on personal records and data, the results of which are reported in the IAR. Lessons learned from this will then be used to expand into a larger audit of all data and records used in the Council.

### **7.2 Focus on functional business processes**

The focus of the data audit will be to understand what data is being produced as part of any service area's functional responsibility. This will entail understanding the business processes that deliver that function and which systems are being used to support those business processes and, therefore, what data is being created. This approach is consistent with ISO 15489, which defines best practice for the management of records and describes the characteristics of records systems and provides a framework for implementation.

### **7.3 A data audit questionnaire**

An Audit Questionnaire will be completed for each business process. A business process is a structured set of activities designed to produce a specific output for a particular set of customers. This is best defined by taking a customer's point of view. The Knowledge and Information Manager will work with the service area to refine the list into an appropriate and accurate list of business processes, which that service area undertakes to deliver their function. As part of this work, the service area will need to provide a list of people to work on the audit and to respond, so that the audit questionnaire can be completed correctly.

The audit therefore comprises:

- The business process
- The system(s) being used to support that process
- The data being created and managed by that system
- The people skills required to manage this properly
- The way this data is classified in terms of the service area's function

## 7.4 Using the outcome of data audits

The data audits will provide information that will enable the Royal Borough to produce a gap analysis and improvement plan for each and every business process. In many cases this will simply mean working to improve or resolve known issues that might exist, but it may mean that new data systems are identified. The data audit action plan, therefore, becomes the Royal Borough's robust improvement plan for all business data across the Royal Borough and should be repeatable as the Royal Borough begins to improve the way it manages the data it holds.

## 7.5 Business processes defined

A business process is a structured set of activities designed to produce a specific output for a particular set of customers. This is best defined by taking a customer's point of view.

Example: 'To provide network access for new staff when they join the Royal Borough'

- a trigger/input: when new staff join the Royal Borough
- a structured set of activities (all the steps involved in this – e.g., getting a request, having a form filled, the procedure followed etc.)
- to produce a specific output (access to the network/a user account)
- for a particular set of customers. (new staff)

Example: 'To provide cleaner streets for Greenwich residents every day'

- a trigger/input: every day (routine process)
- a structured set of activities (all the steps involved in this)
- to produce a specific output (cleaner streets)
- for a particular set of customers. (Greenwich residents)

## 7.6 The audit will be undertaken in the following way:

- A list of functional service areas will be audited. This list will be based on the Local Government Classification Scheme.
- Each service area will need to nominate a Data Audit Representative. There needs to be a named representative for each functional area to be audited.
- The Knowledge and Information Manager will provide each service area with the Local Government Classification Scheme as a starting point for listing that service area's business processes.
- The Knowledge and Information Manager will work with the service area to refine the list into an appropriate and accurate list of business processes which that service area undertakes to deliver their function. As part of this work, the service area will need to provide a list of people (Business Process Reps) that the Knowledge and Information Manager can work with for each process so that we can complete the audit questionnaire correctly. In many cases this is likely to be the same person.
- An audit questionnaire will be completed for each business process. This will be undertaken in the following way: send the service area's Business Process Rep the questionnaire; Business Process Rep completes the questionnaire; the Knowledge and Information Manager arranges a follow up meeting (if needed) to complete any information needed; and the Knowledge and Information Manager checks the audit responses with the service area's Data Audit representative.

- The Knowledge and Information Manager will produce a full audit for the entire Royal Borough, which will be made readily available on the Royal Borough's intranet.

## 8 Training and awareness

### 8.1 General records management training

Staff training and awareness is critical to the success of records management within the Royal Borough. Records management will be included in the Royal Borough's corporate induction in a general sense so that staff are aware of their responsibilities.

### 8.2 Business specific records management training

All staff will be appropriately trained to manage the records they manage in the course of their day-to-day duties.

All staff should be appropriately trained on information quality assurance, and, in particular, 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;
- how to validate information 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 therefore why timeliness, accuracy and completeness of recording is so important); and how to update information and add in information from other sources.

## 9 Changes, Approval and review of policies

### 9.1 Annual review, approval, and adoption

This policy framework and the commitment to security management is subject to continuous, systematic review and improvement. This *Overarching Information Governance Security Policy Framework* will be governed by the Information Governance Steering Group, which is chaired by the Information Governance Lead.

### 9.2 Formal approval, adoption and review

This policy will be formally signed off by the Greenwich Management Team.



## 10 Appendices

### Appendix A: Data Audit: Questionnaire and data Fields

#### Organisational

Service Area's Data Audit Representative	
Directorate	
Department	
Service	

#### Business Process being audited

A business process is a structured set of activities designed to produce a specific output for a particular set of customers.

Name of the business process	
Who is the customer of the business process?	

#### Systems used to support the business process

What system(s) are used to store data to support this business process?

What system is used to store the request?	
What system(s) is used to store data during the processing of the request?	
What system is used to store the output of the request?	
How many systems (in total) are used to support this business process?	

For each system

#### System details

If there is more than one system supporting this business process, then questions 5.3 onwards need to be completed for each system.

Name of the system	
System owner	

Is management of the system in staff JD?	
Description of the system	
Is there a written security policy for this specific system?	

**Support arrangements for the system**

Are there in-house experts to support this system? Please name these people.	
Lead name for licensing	
Lead name for contract	
Is there a formal support arrangement in place for this system (i.e., with a support contract)?	
Name of third party supplier (if applicable)	
Does the system have adequate support (Y/N)	
Is there a Business Continuity Plan?	

**User management**

Are the system users internal and/or external?	
Is training provided to end users?	
How does an end user log on? (i.e., what level of passwords are required)	
How are starters and leavers managed?	

**Data**

Is the data electronic or paper?	
How is data quality validated / checked?	
What are the impact levels of the data?	

Critical, Significant, Minor, Negligible Impact	
Is the data personal or personally identifiable data?	
Are there documented and available procedures to ensure the data is kept up-to-date?	
Are there documented and available procedures for notifying the data subject of the purpose for processing their personal data?	
Are documented and available procedures in place to provide access to a data subject's record?	
Where is the data stored?	
How is access to the data controlled?	
Have the data flows been mapped, documented and available?	
How is data created?	
How is data named?	
How is data filed?	
How is data referenced?	
How is data tracked?	
What is the retention period for the data?	
How is retention managed?	
How is disposal managed?	
Can the data be exported from the system in an interoperable way (xml, csv)?	

**People**

Person who owns the business process	
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Is there a named person who can provide management reports from the system?	
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## 10.1 Appendix B: Records management improvement plan

### 10.1.1 Creation

Business process maps will be produced where service areas are unclear about their business processes or where there is confusion as to what records are being created – or where the master record exists.

A record of all business process maps will be produced and stored centrally, with guidance on how to add to this inventory.

A gap analysis is undertaken, as part of the data audit, to identify which service areas do not have documented procedures around the records they create and a timeline set in place to achieve this.

## 10.2 Appendix C: Minimum metadata requirements for all paper and electronic records

### 10.2.1 All paper records will have the following minimum metadata elements

Mandatory	Mandatory if applicable	Recommended
Title	Unique identifier	Retention and disposition actions required
Subject	File access/tracking	
Date file opened	Security marking	
Date file closed		

### 10.2.2 All electronic records will have the following minimum metadata elements

Mandatory	Mandatory if applicable	Recommended
Title	Accessibility	Coverage
Subject	Identifier	Language
Creator	Publisher	Date opened and closed
Date		