

Records Management Policy

Introduction

Achieving for Children receives and generates a large number of records which document and support its activities. These records are a vital source of information on Achieving for Children's activities, policies and decisions.

The purpose of the records management function within Achieving for Children is to:

- Create and capture authentic and reliable records which provide evidence of Achieving for Children's activities and decisions and which demonstrate its accountability;
- Secure, maintain and preserve records for as long as they are required and to provide access to them as necessary to support Achieving for Children's operations and fulfil its obligations under the Freedom of Information Act;
- Identify records which will form a significant part of the historical record of Achieving for Children's activities and make provision for their permanent or long term preservation;
- Destroy records that are no longer required, having regard to statutory record-keeping requirements, thus promoting the efficient use of physical and electronic storage space.

The Records Management Policy is required to ensure Achieving for Children's information assets are well managed and that the organisation adheres to its statutory obligations. Achieving for Children has made a commitment to be an open and transparent organisation, having robust retention policies and procedures ensures that members of the public understand what information Achieving for Children holds and for how long it will be kept for.

Background and context to the Records Management Policy

The Records Management Policy supports the delivery of the Achieving for Children Information Governance Framework by ensuring that records are reliable, usable and are maintained and made accessible for as long as they are required to support the operation of Achieving for Children.

The Records Management Policy covers all records created and received by Achieving for Children in any format. For the purposes of this document, a record is defined as:

- Recorded information, regardless of media or format, created or received in the course of individual or organisational activity, which provides reliable evidence of policy, actions or decisions.

Records must be managed in line with current legislation; of particular significance is the Data Protection Act 1998 (DPA) which limits the retention of personal information. To comply with the DPA Achieving for Children must have an approved retention schedule and evidence that it has complied with the schedule.

The DPA also requires Achieving for Children to have procedures for classifying personal information and disposing it. This includes paper files, electronic case records and emails that contain personal information. Email archiving systems and backup tapes are not exempt from the DPA.

For a more information regarding relevant legislation please refer to the Information Governance Policy or contact the Information Governance Lead.

Aims of the policy

To set out Achieving for Children's approach to managing the retention and disposal of records.

Objectives of the policy

To ensure:

- employees understand their own responsibilities for record management and the significance of record management for the effective operation of Achieving for Children;
- employees have the tools and guidance necessary to allow them to effectively manage records;
- employees adhere to statutes, government regulations, guidance and best practice principles when managing the retention and disposal of Achieving for Children records. Failure to comply could result in disciplinary action.

Implementing the Records Management Policy

Set out below is guidance for Achieving for Children employees to help them manage records effectively. It is the responsibility of Achieving for Children employees to ensure they apply this guidance when handling and using information to ensure they adhere to the Records Management Policy.

Actions or neglect leading to a breach of this policy by an employee could result in disciplinary action.

Record Retention

Information will be assessed and a retention period set according to the following principles:

- Statutory requirements: information will be retained for only as long as is required by statute;
- Ongoing business need: information will be retained for only as long as it is required to run the organisation effectively. Storing information costs money, therefore storing information for longer than is necessary incurs unnecessary costs;
- Best practice: information will be retained if best practice indicates this would be of benefit. Best practice can be drawn from respected external sources.

When a record has been stored for the duration of its retention period a decision must be made to dispose of the information or to offer it to the archive service if it is deemed to be of permanent historical value.

Retention Schedule – A Retention Schedule for different types of records is available to employees by contacting the Information Governance Lead. The Retention Schedule sets out how long information should be kept before it is disposed of or transferred to the archive service. For information relating to record types that are not included in the Retention Schedule please contact the Information Governance Lead.

Transfer to Archive Service – The process of transferring information to the archive service must take into account the sensitivity of the information, and action must be taken to mitigate against loss of information during transfer. A specific policy and process for Achieving for Children archiving will be developed as an outcome of the Information Governance Group. Until such time local site based arrangements that are in existence already should be followed.

Information wrongly retained – Information may be kept in error as a result of technical problems, human error or by deliberate act. Information kept in error must be reported to the Information Governance Lead. Information kept in error must be disposed of immediately.

Record Disposal

It is essential to take into consideration the format and the sensitivity of the information when deciding on the appropriate disposal method. Paper information that is sensitive, or has potential legal repercussions or a high risk of reputational damage to Achieving for Children must be placed in the confidential waste bins to ensure the information is disposed of securely.

Electronic information must be treated in the same way as physical information; therefore electronic information must be disposed of once it has reached its set disposal date. Each system will have its own method technically for disposal, usually as part of system administration tools. The Achieving for Children Business Systems team can oversee the deletion/removal of records once the service requests deletion. Until deleted the records are 'owned' by the individual services recording them. Appropriate approval must be obtained prior to deletion of records.

Modifying a records disposal date – Requests to amend the date on which a record is scheduled for disposal should be submitted to the Information Governance Lead who will consider the request and if appropriate, set a new revised disposal date.

Wrongful disposal – Wrongful disposal may occur as a result of technical problems, human error or by deliberate act. The wrongful disposal of information must be reported to the Information Governance Lead.

Records disposal register – The Freedom of Information Act 2000 requires Achieving for Children to maintain a list of records that have been destroyed and who authorised their destruction. The register should include the following information:

- file reference (or other unique identifier);
- file title (or brief description);
- number of files; and
- the name of the authorising officer.

It is the responsibility of each Line Manager to ensure their team is maintaining register of records destroyed.

Duplicate records – The duplication of records should be kept to a minimum. Where appropriate, Achieving for Children officers should transfer physical records into an electronic format for storage on the Document Management System and dispose of physical duplicates appropriately.

Non-compliance

Non-compliance with the Records Management Policy may lead to disciplinary procedures as set out in the Disciplinary Code of Conduct. Any breach of the Records Management Policy or any associated documents will be dealt with in accordance with those procedures.

Roles and responsibilities for implementing, monitoring and reviewing

This policy will be reviewed after a period of two years by Achieving for Children to judge its effectiveness, or updated sooner in accordance with changes in legislation.

Information Governance Lead	<ul style="list-style-type: none">• Ensuring that the management of Achieving for Children’s records complies with legal and professional obligations;• Ensuring adherence to proper procedures to ensure that no unauthorised destruction of records occurs, particularly any wilful destruction of records pertinent to a request made under the Freedom of Information Act and which would constitute a breach of Section 77 of the Act.• Ensure that records of historical importance are offered to the Achieving for Children’s Archives for permanent storage;• Advising Achieving for Children employees on records management; and
Business Systems Team	<ul style="list-style-type: none">• Support services in deleting electronic records as requested by each service.
Line Managers	<ul style="list-style-type: none">• Maintain a register or records disposed.• Support their staff in meeting the requirements of the Records Management Policy by ensuring that they are aware of:<ul style="list-style-type: none">○ the policies and guidance that apply to their work area;○ their responsibility for the information that they handle and use;○ where to get advice on Records Management; and○ how to report records held in excess of their retention period.
All employees	<ul style="list-style-type: none">• Ensure that they comply with the Records Management Policy and other relevant procedures.• Seek further advice if they are uncertain how to proceed.• Inform their Line Manager of any records suspected to be held in excess of their retention period.

Date created	January 2015
Signed by:	Ian Dodds, Director of Standards and Improvement
Equality Analysis completed (yes/no):	N/A