# Information Commissioner's Office
# Records Management Policy

## Contents

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, his staff and all who interact with the Information Commissioner's Office. Records, and the information they preserve, are an important corporate asset.

We aim to balance our commitment to openness and transparency with our responsibility as an effective regulator. 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. To support this policy we will ensure that all staff receive appropriate records management training.

We will provide supporting standards, procedures and guidelines and monitor compliance with them. We will review our policy on a bi-annual basis and keep it up to date.

# 1 Policy statement

The underlying principle of records management is to ensure that a record is managed through its life cycle from creation or receipt, through maintenance and use to disposal.

Good records management relies on the following:
- the creation of appropriate records
- the capture of records (received or created) in record keeping systems
- the appropriate maintenance and up-keep of these records
- the regular review of information
- the controlled retention of information
- the controlled destruction of information.

Through adhering to these principles we will benefit from:
- records being easily and efficiently located, accessed and retrieved
- information being better protected and securely stored
- records being disposed of safely and at the right time.

As a public body we are required by law to manage our records properly. Legislation such as the Data Protection Act 1998 and Freedom of Information Act 2000 set out specific requirements in relation to the creation and management of records.

This policy is supported by a set of records management standards which are mandatory across the Information Commissioner's Office (ICO). These standards:
- define how ICO records must be managed;
- enable compliance of existing and evolving records management practice at the ICO to be measured;
- enable the identification and promotion of best practice;
- support the increased use of electronic records as a means of gaining organisational benefits without introducing additional risks.

Standards defining records management practice in the following areas will be adopted at the ICO:
- Determining what constitutes a record
- Version control
- Registration
- Determining how long to retain records[1]

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[1] This includes the development and maintenance of a corporate retention and disposal schedule.

- Vital records[2]
- Indexing/classification
- Storage and handling
- Access and security
- Tracking
- Disposition
- Characteristics of a record

These standards are defined in [Records Management Standards](). ICO records management standards will be supported by procedures and guidance which

- set out how to manage ICO records and what tools to use
- identify and promote best practice.

This policy is designed according to the requirements of the international standard for records management BS ISO 15489.

## 2 What does this policy apply to?

This policy, together with the associated standards, applies to the management of records, in all technical or physical formats or media, created or received by the ICO in the conduct of its business activities.

Although not an exhaustive list, examples of items that can constitute records include:

- Documents (including written and typed documents and annotated copies)
- Computer files (including word processor files, databases, spreadsheets and presentations)
- Paper based files
- Electronic mail messages
- Diary records
- Fax messages
- Reports
- Intranet and Internet Web pages

## 3 Who does this policy apply to?

This policy applies to all employees of the ICO (both permanent and temporary), contractors, consultants, and secondees who have access to records, wherever these

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[2] Vital records will be documented in the ICOs Business Continuity Plan.

records may be located. The policy aims to ensure that all staff are aware of what they must do to manage records in an effective and efficient way.

## 4 Why do we need to manage records?

Maintaining appropriate and effective records management practices will help us to deliver and meet our statutory duties and support our aim to be a 'top of the class' regulatory body. 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:

a. help us carry out our business

b. help us to make informed decisions

c. protect the rights of employees, regulated entities, and the public

d. track policy changes and development

e. make sure we comply with relevant legislation

f. provide an audit trail to meet business, regulatory and legal requirements

g. make sure that we work effectively as a regulator and prosecuting authority and meet our lawful obligations for disclosing evidence

h. support continuity and consistency in management and administration

i. make sure we are open, transparent and responsive

j. support research and development

k. promote our achievements

## 5 Regulatory environment

We work in a regulatory environment influenced by a number of factors:

a) Statute case law and regulations govern our business environment; these include but are not limited to:
   i.    Data Protection Act 1998
   ii.   Freedom of Information Act 2000
   iii.  Environmental Information Regulations 2004
   iiii. Criminal Justice Act 1988
   ivi.  Civil Evidence Act 1995
   vi.   Regulation of Investigatory Powers Act 2000

   vii. Human Rights Act 1998

b) Codes of practice such as the section 46 Code of Practice on the management of records under the Freedom of Information Act 2000

## 6. Roles and responsibilities

The ICO has a responsibility to ensure that its records are managed well. Different staff have different roles in relation to records management and these responsibilities are detailed below:

- ➢ **Executive Team** – board level responsibility for ensuring compliance with this policy lies with the Chief Operating Officer. Individual Executive Team members have responsibility for ensuring that their departments have local procedures and guidance in place which comply with the records management policy and standards and that records management is carried out in accordance with those procedures.

- ➢ **Internal Compliance Board**– this Board is responsible for considering and approving changes to this policy and any records management standards. The Records Management Function will report quarterly to this board on records management matters.

- ➢ **Records Management Function** – this service has the following responsibilities:
    - o to ensure that the records management policy and standards are kept up to date and relevant
    - o to raise staff awareness of records management
    - o to provide advice and guidance to line managers and Local Records Officers
    - o auditing compliance with the records management policy and associated standards
    - o to develop and maintain retention and disposal schedules and document disposal activity.

- ➢ **Heads of business planning units** – are responsible for identifying a Local records officer, to take the lead on records management issues in their department, and ensuring that procedures and guidance are in place which support the records management policy and associated standards.

- **Local records officers** – are the link between the business and the records management function and fulfil the following role:
  - Departmental representative on the Records Management Forum
  - Communication point into and out of the records management function
  - Training new staff on departmental records management procedures
  - Assisting the records management function with the audit programme and other occasional records management projects
  - To act as a contact point in relation to security matters and carry out occasional spot checks in respect of security requirements, e.g. clear desk policy.

- **All staff** – all staff who receive, create, maintain or delete records are responsible for ensuring that they do so in accordance with the ICO's records management policy, standards and procedures.

- **Contractors, consultants and secondees** – everyone with access to ICO's records are responsible for ensuring they do so in accordance with ICO's records management policy, standards and procedures.