

Somerset West and Taunton

Digital Information and Records Management Policy for Councillors

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1. Introduction

This policy provides Somerset West and Taunton Councillors with clear guidance and rules on the storage of corporate data, within the document repositories available from any technology provided and a framework for managing records and information.

Records and information are currently created in both digital and physical format and they should be managed extremely carefully. Records are assets which belong to the council to provide transparency, accountability, business insights and improved service delivery. This policy will help to manage our records and information efficiently, compliantly, and effectively.

2. What are the aims of this Policy?

The aim of this policy is to clearly communicate the importance, responsibilities, and obligations of Somerset West and Taunton Councillors for excellent records management in creating and managing information.

Currently records are created and managed in a hybrid format (both digital and physical). This policy will provide a clear direction for digital records being recognised as the official record. The public have an increasing expectancy to be communicated with online.

It is important to note that Microsoft 365 is recognised as an 'evergreen' solution which means that it is consistently evolving. New applications and processes are implemented by Microsoft on a very regular basis. Therefore, this policy is a living document and will be reviewed and updated as needed.

3. What is MS365?

Microsoft 365 licences have replaced Office 2013 as the corporate application to conduct daily administrative tasks and actions. This provides us a modern cloud-based platform which include the tools and technologies required to carry out council business in digital format. Cloud storage provides very secure storage, resilient disaster recovery and most importantly, it is accessible from anywhere. This supports the modern, flexible workforce ethos adopted within the council's strategic aims.

4. What is Records Management?

Records Management is also sometimes referred to as Information Management. The ISO 15489-1:2016 defines records 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”.

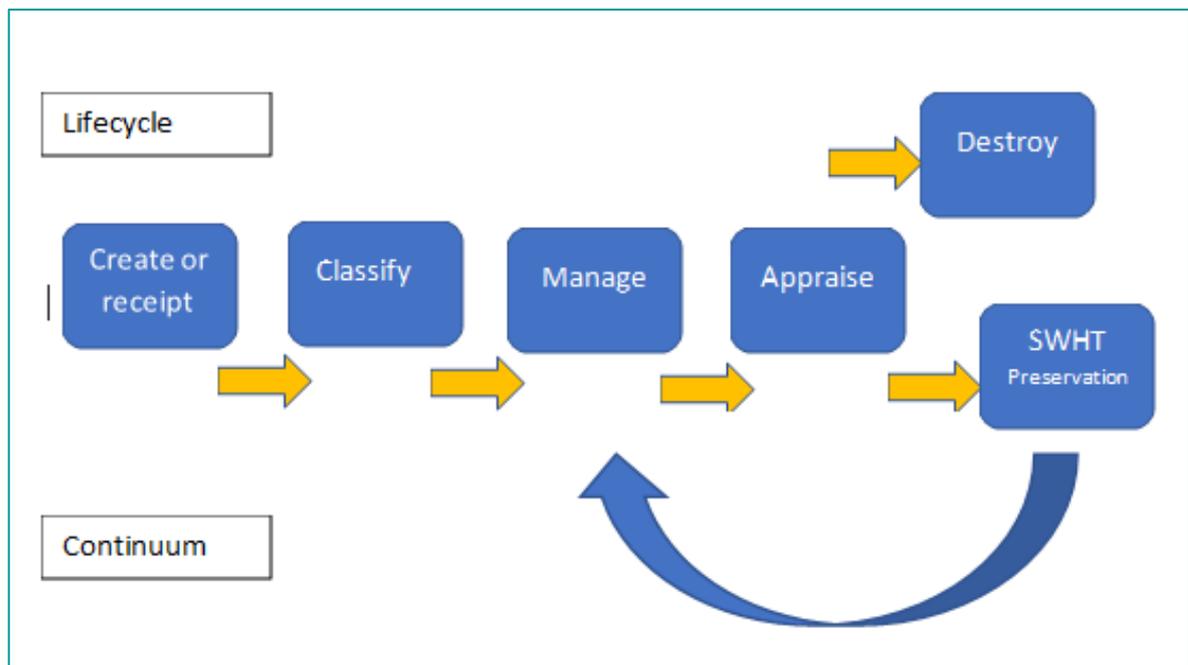
The Records and Information we create should be:

- Authentic
- Complete
- Reliable
- Accurate
- Timely

There are 2 models for managing records, Lifecycle Model and Continuum Model, and it is essential that we manage them carefully as we rely on them for transparency, accountability, service delivery and compliance.

4.1 Lifecycle Model

The lifecycle model consists of 5 stages: creation or receipt, classify, use and management, appraisal, disposition, or digital preservation.



4.2 Continuum Model

The Continuum Model intrinsically links digital preservation with the current records we manage within the council. This approach accepts that records that may have been archived, could become active again if required for evidence or transactional purposes.

Somerset West and Taunton Council has an established relationship with the South West Heritage Trust (SWHT), so this model is the most effective in managing active and archived records together for evidence and transparency. This council has a public duty to transfer approximately 5% of its

records for permanent preservation to the SWHT under The Public Records Act 1958

5. Why is Records Management so important?

The council is dependent on the records and information we create to deliver effective and efficient services. We need to manage our records efficiently and cost effectively to ensure that legal, operational and information requirements are met. Failure to manage our information and records properly is a significant risk as we are publicly accountable and need to demonstrate transparency to ensure that we comply with the public accessibility legislation.

Information and records provide our cultural and archival heritage for the community we serve, corporate memory. They also provide evidence of our transactions and decisions. They are a vital asset which are required for daily operations, including compliance with legal and regulatory requirements. They support:

- Strategy and policy formulation
- Decision-making
- Protect the interests of the council as a corporate body
- Protect the rights of employees, the public and service providers
- Help the council to deliver services in accountable, consistent, and equitable ways
- Help the council to make good use of precedents and organisational experience
- Support consistency, creativity, efficiency, and productivity
- Professional accreditations

Records Management must be recognised an essential function by everyone who works for and with Somerset West and Taunton Council.

5.1 Compliance with the law

Somerset West and Taunton Council is a public authority and is subject to public accessibility legislation.

In addition to this, Somerset West and Taunton Council must comply with lots of other legislation, regulations and best practice known as 'the wider legal framework'. Some of these will be specific to services, such as Financial Regulations. However, some of the Wider Legal Framework affects everyone and we should all be aware of them. They are as follows:

Public Accessibility Legislation

- Freedom of Information Act 2000
- The Data Protection Act 2018
- Environmental Information Regulations 2004
- UK General Data Protection Regulations (GDPR)

Wider Legal Framework and Best Practice

- The Public Records Act 1958 & 1967
- The Human Rights Act 1990
- Copyright, Designs and Patents Act 1998
- Communications Act 2003
- Lord Chancellor's Code of Practice on the Management of Records under Section 46 (part 1 section 7), the Freedom of Information Act 2000
- Cabinet Office Security Policy Framework
- Government Security Classifications Policy (GSCP)
- ISO:15489

6. Records and Information Management Principles

These principles are agreed by Information Management. They support the shift from paper records management to digital by default.

1. **Records Management will be easy.** Clear repositories for councilors to store their records and information. Outlook/OneDrive/Local storage.
2. **Records Management will be modernised by creating and receiving in a digital format, wherever possible.** This will be achieved by transforming the current culture (creating records in both digital and paper) as part of a Records Management Transformation Programme. Post will be received and sent in digital format.
3. **Information should be open (read only) to the organisation** unless there are business or legislative reasons why it should not be. (For example, personal, special category data or business confidentiality). This ensures that the value of data is exploited, personal data is safeguarded and compliance to public accessibility legislation requests are met.
4. **Information created, received, and held within Somerset West and Taunton Council belongs to the Council.** It is a corporate asset, as important as people, money, and property. It is imperative to communicate this principle to all employees through a project communication plan. Data does not belong to individuals and this Council is required to provide transparency and accountability to the public it serves.
5. **Security, access to information and permissions will need to be clear and simple.** Permissions will be controlled by ICT through Active Directory via functional groups. The starter/leaver/changes process and HR system are **an intrinsic prerequisite** to this principle.
6. **Less is more.** Continuous Identification and removal of duplicated, obsolete and data past its retention will ensure that data integrity will remain consistent and provides a resilient foundation for decision making and transparency.

7. **Clear, simple, innovative communication** is imperative to ensure that all understand this policy and their responsibilities.
8. **Data held within the line of business systems will be included within the Retention and Disposal Schedule.** Structured data classified in bespoke systems is subject to DPA, FOI, EIR and the wider legal framework in the same way that unstructured data is drives is.

Somerset West and Taunton Council employees, councillors, suppliers, and partners should know, understand, and abide with the Records Management Principles.

7. Roles and responsibilities

Somerset West and Taunton Council has a corporate responsibility for ensuring that records and information are managed effectively and the systems that we use are properly maintained and managed. Although we are ALL responsible for managing our records in accordance with this policy, there are certain roles specific to different individuals and groups. They are as follows:

Information Management Team

- Management of the Records Management Function
- Custodian and creator of all Information Governance policies, procedures, and best practice
- Ensuring that the policy framework is kept up to date and relevant
- Monitoring records management practice within the council
- Communication and training
- Subject matter expertise
- Implementation of 'Paper to Digital' Strategic Direction
- Custodian of Corporate File Plan and Information Asset Registers
- Assisting with compliance audits, both internally and externally
- Ensuring retention and disposal rules are carried out
- Ensuring the development and procurement of ICT systems includes the consideration of records management requirements

ICT

- Custodian of and creator of all ICT Information Policies
- Management and security of all systems
- Back up and disaster recovery for all records and information held within council systems
- Systems Integration

Employees

- Store information in the correct locations
- Add PII classification to every document
- Manual deletion where applicable

- Regularly liaise with Information Management Team to dispose of physical records on an annual basis

Councillors

- Store information appropriately and not in excess
- Manual retention and disposal where applicable
- Regularly liaise with Governance Team to dispose of physical records on an annual basis

Everyone within the council has a responsibility to create, manage, destroy, or keep records in accordance with this policy and the law.

8. Retention and Disposal Schedule

A Records Retention and Disposal schedule is a policy that defines how we manage our physical and digital records. It provides us with clear guidance on how long we should keep it and when we should delete or dispose of it. This is a living document, and it will be consistently changed to reflect changes in legislation and business requirements.

Why is it important?

Somerset West and Taunton Council is a public authority. This means that we are subject to public accessibility legislation. The Freedom of Information Act 2000, The Data Protection Act 2018, and Environmental Information Regulations 2004. This provides the public with the right to access some records and information that we create (unless exemptions apply).

In addition to this, the General Data Protection Regulations, which updated the Data Protection Act 2018 brought new requirements as follows:

- It states that 'personal information must not be kept for longer than necessary'.
- A lawful basis for processing must be applied to all personal information we process.
- We are monitored by the Information Commissioners Office who could issue us with enforcement notices or fines of up to £17 million or 4% of our annual turnover if we are not compliant.
- We are ALL now responsible for processing personal data.

Everyone within the council must support the development of the new Retention and Disposal Schedule to meet legislative requirements and business needs. All records either digital, physical or email will be subject to the Retention and Disposal Schedule.

This Retention and Disposal schedule will be available to Councillors via the Mod.Gov application.

9. Personal Identifiable Information (PII)

There are 2 classifications for personal identifiable information. These are personal and special category data. We are required to identify personal data and apply the lawful basis for processing it. This is included within the updated Retention and Disposal Policy.

Personal Data

This is specific information that relates to an identified or identifiable individual. What identifies an individual could be as simple as:

- a name
- a phone number
- an identification number, for example your National Insurance or passport number
- your location data, for example your home address or mobile phone GPS data
- an online identifier, for example your IP or email address

Special Category Data

Special category data used to be referred to as personal sensitive. This is information, which if not used appropriately, could cause personal distress or harm. You must manage this information with extra care. The type of records which are classed as special category data are as follows:

- personal data revealing racial or ethnic origin
- personal data revealing political opinions
- personal data revealing religious or philosophical beliefs
- personal data revealing trade union membership
- genetic data
- biometric data (where used for identification purposes)
- data concerning health
- data concerning a person's sex life; and
- data concerning a person's sexual orientation.

Everyone within the council has a responsibility for processing personal or special category data. Everyone should be aware of their responsibilities when processing personal data.

10. Naming our records

Naming conventions are a standard set of rules which must be applied to our records, files, and folders. A consistent approach improves information integrity.

The naming conventions are as follows:

- Start the document with a 6-digit date in reverse order. This ensures that records are stored in date order. YYMMDD e.g., 210116
- Ensure your document is named in a descriptive and clearly identifiable way e.g., Digital Service Annual Report

- Consistent for everyone
- Abbreviations, symbols, or acronyms should not be used as they are meaningless to others

11. Information Asset Registers (IARs)

Somerset West and Taunton Council holds an Information Asset Register for all records and information created and managed in the organisation. It includes the location of assets, retention periods, information asset owners, security, and location.

Information Asset Registers and Information Asset Owners must be updated on an annual basis. The Information Governance Unit are custodians of all Information Asset Registers.

12. Paper Records

Paper records are stored in a variety of locations across the Council. This policy's aim is to rationalise and classify the paper estate. Retention and disposal need to be applied on an annual basis to all paper records. It is everyone's responsibility to ensure that their physical records are managed and disposed of in accordance with the legislative compliance.

13. Email Records Management

Emails are corporate records and should be managed in the same way as all other records within the council. Emails, in many cases, have replaced former physical letters and they should be stored alongside all other records. They may also contain personal data, which if not managed compliantly, could contravene the Data Protection Act 2018 (Information must not be held unfairly, unlawfully, or excessively).

14. Digital Preservation

Every public body is required to transfer approximately 5% of records to their local records centre. This is legal requirement under the Public Records Act. The South West Heritage Trust (SWHT) preserves social and corporate memory for historical and archival purposes. All records assigned for permanent preservation must be transferable in all formats. This policy mandates the transfer of digital and physical records.

15. Legislation and Best Practice

Legislation we must comply with:

- [The Data Protection Act 2018](#)

- [The Freedom of Information Act 2000](#)
- [Environmental Information Regulations 2004](#)
- [UK General Data Protection Regulations \(GDPR\)](#)
- [The Public Records Act 1958 & 1967](#)
- [The Disposal of Documents Order \(No.167\) 1925](#)

Best Practice Guidance to support this policy:

- [Lord Chancellor's Code of Practice on the Management of Records under Section 46 \(part 1 section 7\), the Freedom of Information Act 2000](#)
- ISO15489 (International standard for the management of records)
- [IRMS \(Information and Records Management Society\)](#)
- [TNA \(The National Archives\)](#)

16. OneDrive



OneDrive is a document repository that can be accessed either online or via the desktop application. Every councillor has access to OneDrive. This application provides the ability to share folders and files with others as digital links. Such access can be changed or revoked by the owner whenever they choose.

Retention and Disposal:

- No retention policy is applied to OneDrive.

Access and Permissions:

- Councillors are the owners and have full control of their OneDrive.
- Information must be shared by digital links.

Capacity

- Capacity is restricted to 1GB of data.

17. iPads/Local Storage



Councillors are provided iPads for corporate use, of which have a local storage capacity of 32GB as standard, when all applications are downloaded this reduces to approximately 14GB of available storage space.

Corporate devices are issued for work purposes and should not be shared with anyone else including colleagues, family, or friends.

Retention and Disposal:

- No retention and disposal is applied to the local storage, this will be a manual process in accordance with the Retention and Disposal schedule.

Access and Permissions:

- Councilors are the owners and have full control of their local storage.

Capacity

- iPads are issued at 32GB or 128GB capacity.

18. Outlook

Outlook is the corporate email system for the council and all councillors will have access to an individual email account for internal and external communication. It is important to recognise that emails are a corporate record and should be managed carefully by holding them appropriately in relation to casework, not in excess, and applying manual retention and disposal.

Retention and Disposal:

- No automated retention and disposal policy is applied to Councillor mailboxes. This must be a manual process by the individual.

Access and Permissions:

- Councilors have control of their own mailboxes.

Capacity

- Storage is unlimited.

19. OneNote



Microsoft OneNote is a virtual notebook for information gathering. OneNote books and pages can be shared with other OneNote individuals for collaboration and reference. Its functions include the ability to draw, add documents, clipping and audio commentaries.

Use and Access

- OneNote must only be used for informal note taking which are temporary in nature.

Storage

- OneNote is automatically saved to an individual's OneDrive, so it is essential regular cleansing is applied as OneDrive is restricted in size.
- Regular reports are run to monitor the capacity of individuals OneDrive.

20. Zoom



Zoom is a video conferencing platform which allows Councillors, the public, and council employees the ability to conduct online meetings. Zoom features include high-definition video and audio and supports up to 1,000 participants per session.

Use and Access:

- Meetings are accessed by invitation link
- No personal content should be shared on Zoom meetings unless explicit consent is gained.

Retention and Disposal:

- No content stored within Zoom. Any recordings of Zoom meetings should be stored appropriately within the corporate document management system where the correct retention and disposal will apply.

21. Mod.Gov

Mod.Gov is the corporate system for Councillors to access all council meeting papers, agendas, meeting notes, supporting documentation and this includes confidential documents.

Confidential sections are password protected and users have a responsibility to keep these documents secure and their passwords safe.

Retention and Disposal:

- Applied manually where necessary by the Governance Team.

Use and Access:

- All Councilors have access to view the content and download it (except from items marked confidential). If documents are downloaded from the application, to write on/annotate, it is the user's responsibility to ensure they are stored appropriately, not shared with anyone unauthorized and are not held in excess.

Storage:

- All content is loaded onto the system by the Governance Team, Councilors cannot store anything additional.

| Approval | Name | Date |
|---------------------------------|---------------|-------------|
| Director of Internal Operations | Alison North | 26.05.22 |
| Information and Records Manager | Lauren Davis | 24.05.22 |
| Senior Management Team | CEO/Directors | 01.06.22 |
| Executive | | |