

# Records Management Policy

1. This document sets out the Records Management Policy for the Education Workforce Council. The Council recognises that the efficient management of its records is necessary in order to support its core functions, to comply with its legal and regulatory obligations and to enable the effective management of the Council.
2. Records Management is defined as the responsibility for the efficient and systematic control of the creation, receipt, maintenance, use, distribution, storage and disposal of records.
3. The purpose of the Policy is to ensure the creation and maintenance of authentic, reliable and useable records, by establishing a framework and accountability for records management, through which best practice can be implemented and audited.
4. Records are defined as all those documents, regardless of format, which reflect the Council's activities and the business carried out by the Council. They may be created, received or maintained in hard copy or electronically. This Policy covers both formats.
5. The Council also has a responsibility to comply with legislative requirements, relating to records contained in the Data Protection Act, General Data Protection Regulations, Freedom of Information Act and the Public Records Act.

## Related policies

6. This policy must be read in conjunction with:
  - Information technology security and usage
  - Personal data breach policy
  - Freedom of Information Act (FoI)/Environmental Information Regulations 2004 Information Guide and FOI Publication Scheme
  - The Education Workforce Council privacy notice
  - Business Continuity & Risk register
  - Records management policy and the retention schedule
  - Code of Conduct for Council Officers

## The need for records

7. The Council must keep a record of its activities so that:
  - Its transactions are properly documented;
  - there is continuity in the event of a disaster;
  - the Council can account its actions to interested stakeholders;
  - an audit trail is possible;
  - responses to requests under the Freedom of Information, the General Data Protection Regulations and the Environmental Information Regulations can be given;
  - an historical record of the Council's business is available.

## Responsibilities

8. The Council has a corporate responsibility to maintain records and systems in accordance with Regulations. Since records management is a specific corporate programme, the Chief Executive and Senior Management Team have a major stake in the implementation of best practice. The day to day responsibility for the Records Management System will fall to the Team Managers assisted by the Administration Team. This responsibility sits alongside the responsibility for the archive, information governance and freedom of information systems.
9. Team Managers, within the relevant teams, will be responsible for records generated by their departments' activities, namely to ensure that the records created, received and controlled within their department are managed in a way which meets the aims of this Records Management Policy.. Annually, Team Managers will undertake/review the EWC data/information audit sheets for their team. The information from the annual data audit form the basis of the development/review of the retention schedule for deciding how long records should be retained. The retention schedule and subsequent updates will be communicated to all staff via Managers. The Administration Team will discuss with Managers and use the retention schedule when paper records are sent externally to Archive storage premises. These time-scales will reflect legislative requirements for retention of documents of particular types.
10. The IS Officer will be responsible for ensuring that the Council's electronic systems and their functions, comply with this Policy and related legislative requirements.
11. The Data Protection Officer will assist with monitoring internal compliance and advise on data protection obligations.
12. The Data Protection Working group will assist with identifying good practice, contribute to the review of the retention schedule and with monitoring compliance.
13. Individual Council officers must ensure that the records for which they are responsible are complete and accurate records of their activities, and that they are maintained and disposed of in accordance with the Council's Records Management Policy. This will encompass both the paper and electronic records which they maintain.

## Storage of Paper Records

14. All active live paper records will be held with each team of the Education Workforce Council which will minimise the requirement for external archive storage. Access to each team's records should be restricted to those authorised to access the information only.
15. Live records will be retained as per the timescales set out in the retention schedule, usual practice would be the current financial/academic year, but in exceptional cases, it may be that the current and previous years' records may be retained in the office.

Any records which are considered to be of a “Confidential” nature should be retained in lockable cabinets and cupboards. Staff should ensure that documents containing personal information are stored closed, in a secure location in order that the contents are not accidentally seen by persons unauthorised to do so.

## **Archiving and Retention**

16. Team Managers will be responsible for the archive of paper and electronic records as per the retention schedule. They will prepare the records for archive and inform the Administration team that they are ready for archiving, also ensuring that the destroy date is entered on the archive boxes.

## **Disposal**

17. Paper records which have been sent out to external archiving storage will be logged both at the Council and also at the archive site. Destroy dates will be logged by the external storage site and records destroyed on the relevant dates as originally informed by the Council. The Administration Team will double check with the relevant teams that the records are to be destroyed before giving authorisation to the storage company for them to be destroyed. The Council will receive confirmation that the records have reached their destroy date and have subsequently been securely destroyed.

18. All paper documents no longer required containing confidential and/or personal data must be disposed of appropriately i.e. by shredding or depositing in confidential waste sacks.

19. There will be documents which will need to be permanently retained as per the Public Records Act 1958 e.g. Council and Committee Minutes as they are an official record of the Council’s business operations. A decision has been taken to donate a copy of these papers to the National Library for Wales and this will be organised by the Council Secretary on an annual basis.

## **Access to Archived Records**

20. Archived records can be re-called to the office at any time. They will be returned within a 24 hour period when requested. This will ensure that any information which is needed to respond to a query or complaint can be accessed without any delay.

## **Storage of Electronic Records**

21. Many electronic documents are produced in the course of Council business, with varying degrees of value and longevity. These can be in various versions – working, draft and finalised documents – and various formats: from conventional text-based documents (such as MS Word files or PDF files), e-mail messages taking the place of memos and phone calls; e-mails commenting on attached documents; and spreadsheets.

22. Not all electronic documents are formal records. This section is aimed at those electronic documents which are more formal and that would be expected to be kept as records in one form or another. Some may have a paper equivalent and those would be archived as well as the electronic version. Staff may wish to refer to the Government Security Classifications for more guidance and good practice in this area  
<https://www.gov.uk/government/publications/government-security-classifications>.
23. Electronic records, particularly those used by more than one individual, should be structured into directories, sub-directories and folders on the P Drive, with records that form part of the same objective to ensure that all evidence of the same business activity is grouped together and safeguarded. This ensures that individual records are easier to find and can be read in their wider context. The structure of directories, sub-directories and folders must be simple and logical with the electronic folders proceeding from the general to the specific. As far as possible, electronic records should not be stored in personal workspace. Directories should be restricted to only those that require access.

## Archiving, Deletion and Retention

Additional information is available in the EWC's retention schedule.

24. Electronic Files. All records should be accurate and not kept longer than is necessary and, should only be retained for one (or more) of the following criteria:
- legal requirement (e.g. fitness to practise casework, financial records);
  - public interest (e.g. corporate & policy documents);
  - business needs (e.g. funding programmes, operational matters).
20. Team Managers will be responsible for adhering to the retention schedule when deciding to permanently delete or archive electronic records from the P drive to the Archive Drive.
21. Team Managers will also ensure good housekeeping and remove unnecessary duplicates of final documents; working copies that are no longer required and documents that contain no continuing value to the Council.

Database Records. The records held by the Council on databases, e.g. the Register of Education Practitioners, form a core resource of the Council – these live records are kept permanently on the database; historical data (such as change of name/address or workplace) is archived automatically by the database application itself.

22. Emails. The retention period of an e-mail is determined by the importance of its contents. Retention decisions should be based on the retention schedule and be taken on a case by case basis at the time of receiving and sending. Most emails do not need to be kept beyond the timeframe of the task to which they refer. If an email is sufficiently valuable as to be kept as a permanent record then for business continuity purposes, and also to enable the Council to meet its freedom of information and data protection obligations, important emails and attachments should be stored in the relevant part of the P Drive where they will be accessible to other staff



Emails which have not been saved to the P Drive will be automatically deleted after 1 year when kept in Outlook this timeframe may be subject to change, in which case staff would be given 3 months' notice. Staff are responsible for moving emails that need to be retained out of their mailbox before the system automatically deletes them.

23. Confidential Electronic Records. Confidential documents and emails when moved to the archive drive will be placed in secure folders so that only relevant staff can access them.

## **Document control and monitoring**

Compliance with this policy will be monitored by relevant departments within the EWC and this policy will be reviewed annually, unless where review is required due to external changes such as legislation.