information management & security

Gloucestershire COUNTY COUNCIL

Information & Records Management Policy

1.0 Policy Statement

Information is a valued corporate and public asset. It is a critical resource required to deliver the council's business objectives and to meet the expectations of our customers. The council is committed to creating, keeping, and managing records that document its activities to an appropriate standard to meet its business needs; the requirements of information legislation; and to protect information from loss, unauthorised access or disclosure. This applies to all records and information for which the council is responsible.

The aim of this policy is to provide a framework for managing the council's information to enable the council to:

- deliver quality services by having timely access to meaningful and appropriate information;
- make informed decisions;
- be open and transparent;
- respond appropriately to information requests from the public;
- protect vital records;
- comply with the law;
- work with partners;
- protect our reputation and provide accountability over time.

This policy also aims to ensure that information is appropriately protected, and outlines responsibility for information assets and information handling.

2.0 Information Management Principles

The council will ensure that:

- **We manage information effectively as a strategic Gloucestershire County Council (GCC) resource.** Information resources, regardless of where and in which form they are held, are a corporate resource and hence the property of GCC and not the property of individual employees or teams. All information resources and processes must add value to the work of GCC and demonstrate value for money;
- **We are all individually responsible for the council's information assets.** Those with specific responsibility for managing information assets must be

clearly identified. However, all users are responsible for how they process information;

- **We share information responsibly with our colleagues, partners and customers.** Staff should be able to access information to perform their role effectively and there should be the opportunity for the free flow of information, as appropriate, across GCC. However, there must always be a reasoned approach to information sharing, taking confidentiality and the requirements of the Data Protection Act into account;
- **We purposefully protect information**, especially personal information, which cannot be shared for legal reasons, e.g. in relation to privacy, security or due to commercial sensitivity. It is important that information is safeguarded to prevent loss, inappropriate access, deliberate compromise or opportunistic attack, as well as to comply with legal and regulatory obligations;
- **We produce information that is reliable, accurate, complete, up-to-date and can be trusted in line with our customers' expectations.** Information must be timely, relevant and consistent, with duplication of information kept to a minimum;
- **We maintain our information in compliance with our statutory obligations**. Information management must comply with prevailing legislation. Information must be managed in accordance with GCC policies, standards and procedures and information must be kept secure as required by these obligations;
- **We keep adequate records of what we do and retain them in the most cost effective way.**

3.0 Scope

This policy applies to all employees, elected members, contractors, suppliers, agents and representatives and temporary staff working for or on behalf of the council who create and manage records on the council's behalf or have access to council records.

All employees, elected members, contractors, suppliers, agents and representatives and temporary staff working for or on behalf of the council are expected to comply with this policy at all times when accessing the council's records, whether accessed locally or remotely (e.g. via the council's Remote Access Gateway, or via any council owned device). Breach of this policy may be dealt with under the council's Disciplinary and Dismissals Procedure and in serious cases, may be treated as gross misconduct leading to summary dismissal.

The policy applies to information in all formats, whether paper, electronic or audio-visual. It includes emails produced or received in the conduct of business and records managed on behalf of the council by an external body, such as a contractor.

These all form part of the corporate record and need to be managed according to corporate procedures.

4.0 Relationship with existing policies

This policy has been formulated within the context of the following council documents:

- Information Strategy
- Data Protection Policy
- Information Security Policy
- Information Protection & Handling Standards
- Digital Continuity Policy
- Scanning Policy
- Clear Desk Policy

These can all be found on the council's website.

5.0 Roles and Responsibilities

The **Chief Information Officer (CIO)** is accountable for effectiveness of the council's arrangements for managing and protecting information.

Senior Information Risk Owner (SIRO) is responsible for information risk on behalf of the Chief Executive and the Corporate Management Team.

The **Head of Information Management Service & Data Protection Officer (DPO)** is responsible for setting strategic direction and ensuring that policies and processes are in place for the appropriate management of information. The DPO ensures that the council has adequate resources in place to enable compliance with data protection legislation

Information Asset Owners are responsible for ensuring appropriate information management practices are in place for their information assets (bodies of discrete information) and to review these regularly. Information Asset Ownership will be assigned to a role with a level of seniority appropriate to the value of the asset owned. Where an information asset is specific to a particular service area, then the owner will be the manager responsible for that service area.

Senior Managers are responsible for ensuring that the business areas they have responsibility for have processes and procedures in place that support this policy. "Senior Managers" are Directors, Lead Commissioners, Operational Leads and Heads of Service.

Commissioning, Contract and Project Managers are responsible for considering information management implications when planning to out-source services, work

with partners, or commission new technologies or major structural changes; and ensuring ongoing appropriate use, retention and disposal of council information and records throughout the life of any contract or joint arrangement.

Line managers are responsible for ensuring their staff are aware of their information management responsibilities; that staff are appropriately trained or experienced and appropriate access arrangements and security measures are enforced for information held within their teams.

All staff (including temporary staff), elected members, contractors, consultants and agents (all being known as “information users”) are responsible for documenting their actions and decisions accurately in the council’s records and for managing information in accordance with this policy and related procedures. When leaving the council, all must ensure that the council records for which they are responsible remain accessible.

The Information Management Service is responsible for producing related policies, standards, procedures and guidance, advising and training GCC colleagues on their information and records management responsibilities. It also provides storage for semi-current paper records and maintains inventories of the council’s information assets.

The ICT service is responsible for providing and maintaining a secure infrastructure to allow information users access to information they require to deliver their services. In conjunction with Information Asset Owners and the Information Management Service, the ICT Service develop and maintain appropriate electronic records storage and disposal solutions using cost effective and approved technology solutions.

Gloucestershire Archives is responsible for producing related policies, standards, procedures, guidance and storage for those records (paper and electronic) which need to be kept permanently. Gloucestershire Archives can be used for long term and permanent storage.

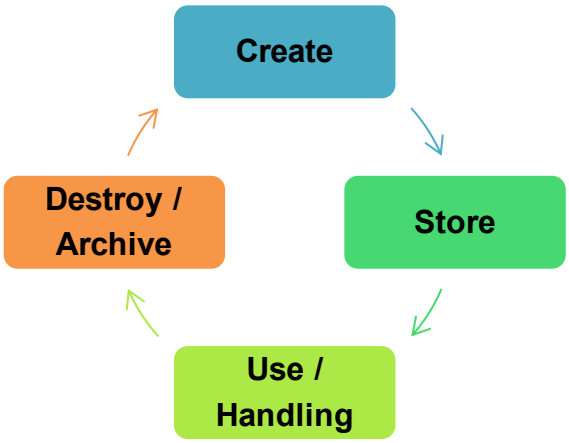
6.0 Offsite Hosting and Third Party Suppliers

Commissioners, Contract Managers, Project Managers and Information Asset Owners will make appropriate **contractual and operational arrangements** where information is stored, managed or hosted elsewhere on behalf of the council to ensure its safe keeping, transfer, appropriate use, disposal and/or return at the end of the contract.

7.0 Records Management

7.1 Information lifecycle

Records must be managed through their lifecycle: from their creation, through storage and use (including information handling), to disposal, whether destruction or transfer to archives.



7.2 Creation and maintenance

Information users will:

- create, keep and manage records that document the council's principal activities;
- maintain all records the council requires for business, regulatory, legal and accountability purposes. The requirements for different classes of records are documented in the corporate Records Retention Schedule;
- create records with meaningful titles and metadata so that they can be retrieved quickly and efficiently;
- make sure our records are authentic, reliable, have integrity and remain usable. This includes making appropriate arrangements for ensuring the continuity and availability of information when staff leave; during major organisational or technological change.

The Information Management Service will:

- Produce naming conventions and guides for metadata for use across the council;
- Provide training and guidance on what should be retained as records.

Information Asset Owners will:

- Ensure processes are in place so that only authorised individuals can access information;
- ensure appropriate backup arrangements are in place for electronic records (including restoration of backups and disaster recovery if electronic records are damaged);

- Ensure safeguards are in place against damage and unauthorised destruction of paper records.

7.3 Storage

To maximise efficiency, reduce costs, enable sharing and minimise risks,

Information users will:

- store key business information in **shared** corporate repositories (e.g. SharePoint, ERIC, Liquid Logic);
- store information **securely**, appropriate to its classification;
- avoid storing **duplicates** (e.g. avoid paper/electronic overlaps) and **routinely destroy unnecessary information** (in accordance with the corporate Records Retention and Disposal Schedule);
- use the **corporate Records Centre** for storing and managing semi-current paper records not required on a regular basis, rather than offices or other locations;
- transfer records for permanent preservation to **Gloucestershire** Archives;
- not store information permanently on **removable media** (e.g. DVDs, external hard drives).

The Information Management Service will:

- Provide a records centre service for the secure storage and management of paper records;
- Work with teams across the council to ensure electronic records and information are stored on network drives and in systems to enable availability and information sharing as appropriate.

Gloucestershire Archives will:

- Maintain records of the council's major activities and decision-making permanently as a corporate memory;
- Develop means of long-term digital preservation of digital information.

7.4 Use

In order to balance the council's commitment to openness and transparency and making best use of information with our responsibility to maintain privacy and sensitivity,

Information users will:

- ensure all council records are subject to appropriate security measures as set out in our Information Security Policy and related policies;
- document decisions regarding access so that they are consistent, and can be explained and referred to;

- Proactively publish information where it is considered to be in the public interest, as long as this is in line with legislation and the council's code of conduct.

7.5 Information Handling

Information users will:

- Handle, transfer, store and dispose of all information, where a duty of confidence applies, in accordance with the council's Information Protection and Handling Standards.

The Information Management Service will:

- Publish, maintain and promote the Information Protection and Handling Standards.

7.6 Disposal and retention

Information users will:

- Manage paper and electronic records appropriately for the length of their retention period and ensure that records are only retained for as long as required;
- In accordance with the Records Retention and Disposal Schedule, review records of all formats at the end of their retention period and arrange for secure destruction; transfer to Gloucestershire Archives; or, if required, retain for a further period;
- Maintain an audit of the destruction or transfer of records;
- Ensure records that may be subject to information requests made under Freedom of Information; Data Protection; and Environment Information legislation are not destroyed;
- Capture intended records review and/or disposal dates at the point of creation.

The Information Management Service will:

- Publish, maintain and promote the council's Records Retention and Disposal Schedule so that all staff are aware of how long to retain records and what action to take at the end of the required retention periods;
- Design and promote tools to enable information users to maintain audits of disposal of files;
- Action and manage the secure destruction of semi-current records stored in the Records Centre, following review and authorisation from relevant file owners.

Gloucestershire Archives will:

- Retain both paper and electronic records, as appropriate according to the Data Protection Act, for reasons of
    - openness,

  - transparency,
  - accountability, and
  - historical research.
- Will provide access to paper and electronic records held in the archive to both information users and the public.

8.0 Available guidance

Guidance on the procedures necessary to comply with this policy is available on the Information Management, Security & Governance Staffnet pages at:

- Creating records (titling, versioning etc)
- Information sharing
- Retention periods for records
- Transfer of records to the records centre
- Secure disposal of records
- Ownership of records
- Digital Continuity Policy
- Outsourcing services and information management in contracts
- Information Classification

9.0 Performance Management

The Information Management Service will monitor performance with this policy. Performance measures will cover the work of the Information Management Service, as well as compliance within business areas.

10.0 Relevant Legislation and Standards

- Public Records Act 1958 and 1967
- Local Government (Records) Act 1962
- Local Government Act 1972
- Local Government (Access to Information) Act 1985
- Data Protection Act 2018
- Access to Health Records Act, 1990
- Freedom of Information Act 2000
- Environmental Information Regulations 2004
- Lord Chancellor's Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act 2000

11.0 Document Control

11.1 Document information

Owner:	Jenny Grodzicka, Head of Information Management Services
Author:	Heather Forbes, Head of Archives Jenny Grodzicka, Head of Information Management Services Libby Varley, Information & Records Manager
Reviewer:	Heather Forbes, Head of Archives Service
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Scheme of Delegation ref:	
Version:	6.5
Classification:	UNCLASSIFIED

11.2 Version History

Version	Version date	Summary of Changes
4.0	April 2016	Amended to reflect changes within the council and the structure of The Information Management Service & Gloucestershire Archives. Included ICT responsibilities and section on offsite hosting/3rd party suppliers.
4.1	May 2018	Updated links due to new IMS pages on Staffnet and change DPA 1998 reference to DPA 2018.
5.0	March 2019	Amended to incorporate sections of the Information Protection and Handling Policy, which this policy supersedes. Included further reference to electronic records management and detail regarding the role of the Information Management Service.
6.0	April 2022	Amended to enhance reasons for retaining records for archives in line with the DPA 2018 and to separate Chief Information Officer and SIRO roles as these are now held by 2 different people. Updated links due to new IMS pages on Staffnet. Approved by Information Board 12 May 2022
6.1	January 2023	Accessibility review and updates to formatting.
6.2	January 2024	Removed references to P: and S: drives and replaced with M365 equivalent.

Version	Version date	Summary of Changes
6.3	March 2024	Broken links fixed
6.4	June 2024	Broken links fixed following migration of StaffNet to SharePoint.
6.5	June 2025	Reviewed by HF, no content change, broken link fixed.

11.3 Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 3 years.

11.4 Contact Us

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