

NICS Records Management Policy

Version 2.0

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1. Introduction and Purpose

This strategic Records Management Policy details the commitment of the NICS to achieving the highest possible standards in records management. Each NICS Department will support this policy through the delivery of subordinate policies, guidance and procedures, which are detailed below.

The NICS handles a vast amount of information. This information relates to specific topics and policies as well as records of decisions, action taken and the rationale behind these decisions made by individual Departments and the Executive as a whole. The NICS appreciates that its records are a vital public asset and are required to ensure the effective operation, openness and accountability of each Department. Like any asset, records require careful management and this policy sets out the NICS's responsibilities and activities in respect of this.

Effective records management goes a long way to ensuring that we have the right information at the right time to make the best-informed decisions we can. It also provides evidence of what we do and why, therefore protecting the interests of the NICS, our members of staff and all who interact with the NICS. We aim to balance our commitment to openness and transparency with our responsibility as an effective information controller and processor.

We continually create records and will work to ensure that we manage them efficiently, make them accessible to all where possible, and retain them securely throughout their lifecycle. All records created will ultimately fall to a single department to manage, as the controller, and the information should be managed by them in line with this NICS and departmental policy, or in line with what has been specified within agreed MOU or SLA standards as required.

By adopting this policy, the NICS aims to make sure that the record, whatever form it takes, is accurate, reliable, ordered, complete, useful, and accessible whenever it is needed.

2. Scope and Objectives

This policy applies to the management of all documents and records, in all formats or media, created or received by NICS Departments in the conduct of their business activities. It also applies to all staff, contractors, consultants and third parties who may be given access to our documents and records and information processing facilities. A systematic approach to the management of the records we hold is essential to protect and preserve the evidence of our actions and decision-making. A small percentage of the records held across the NICS will be selected for permanent preservation by the Public Record Office of Northern Ireland (PRONI) to form part of Northern Ireland's archival heritage.

In order to achieve this systematic approach the NICS will:

- ✓ Create and capture accurate, authentic and reliable records;

- ✓ Maintain records to meet the Executive's business needs;
- ✓ Operate a "digital first" policy, maintaining only one corporate copy of a record in one location;
- ✓ Dispose of records that are no longer required in an appropriate manner;
- ✓ Protect vital records;
- ✓ Conform to any legal and statutory requirements relating to record keeping;
- ✓ Comply with rules on best evidence in law courts; and
- ✓ Comply with government directives.

3. Regulatory Environment

Each Department of the NICS is a data controller with obligations set out in the Data Protection Act 2018 and a public authority with obligations under the Freedom of Information Act 2000.

The legal and regulatory framework for records management is outlined below and includes:

The legislation regulated by ICO:

- The Data Protection Act 2018
- The Freedom of Information Act 2000
- Regulation (EU) 2016/679 (General Data Protection Regulation)
- Privacy and Electronic Communications Regulations 2003
- The Environmental Information Regulations 2004

Other related legislation:

- The Public Records Act (NI) 1923
- The Re-use of Public Sector Information Regulations 2005
- Disposal of Documents Orders 1925

Related guidance and codes of good practice:

- Section 46 Freedom of Information Act –Records Management
- BS ISO15489 –Records Management
- The ICO's published guidance and codes of practice

4. Relevant Standards Subordinate Policies Guidance and Procedures

This section provides an opportunity to take a holistic view of relevant policy guidance and procedural documents held across the NICS. The table below details those documents that are NICS “corporate” versions. It would be advised that each Department take this as a starting point and produce a table that also includes all relevant departmental RM documentation.

Primary Policy	Standards	Subordinate Policy	Guidance/ Procedures
NICS Records Management Policy	Records Management Standard 1 – Document Creation		NICS naming conventions best practice guidance
	Records Management Standard 2 - Capture / Storage of information	NICS Email Management Policy	
	Records Management Standard 3 - Use and Security of information	NICS Policy on the use of SharePoint 2018	
			NICS Box Processes and Procedures
			NICS Secure File Transfer Protocol (SFTP) approval process 2018
	Records Management Standard 4 – Retention and Disposal	NICS Retention and Disposal Policy	PRONI guidance on retention and disposal
		PRONI Appraisal Policy	
		PRONI Selection Policy	

5. Responsibilities

The NICS has a shared responsibility to maintain its records and record keeping systems in accordance with the regulatory environment as described above. In order to achieve this, certain members of staff have specific roles in relation to records management. The senior manager within each NICS Department with overall responsibility for this policy is the Senior Information Risk Owner (SIRO). Each Departmental Information Management Branch/Unit (IMB/IMU) draws up policy

guidance and procedures to drive good records management practice throughout their Department. In addition, the IMUs also take responsibility for compliance with the relevant policies in such a way as to ensure the easy, appropriate and timely retrieval of information. Each IMU provides advice on policy and best practice and reports to the Departmental SIRO.

Each Department also has a network of Information Asset Owners, who have overall responsibility for the management of the records generated by their Business Areas. They are responsible for making sure that a complete record of the business undertaken by their area is captured, and that records management systems (electronic or otherwise) and procedures are used appropriately. They are assisted in this by local information management officials who play a key role in providing a dedicated, well-trained source of expertise on information management within each business area. They act as a conduit to ensure legislative requirements and departmental policy are communicated to senior management and staff and implemented within business areas.

All employees of the NICS (permanent and temporary), contractors, consultants and secondees must ensure that the records for which they are personally responsible are complete and accurate. They must also ensure that records are maintained and disposed of in accordance with the Departmental records management policies and procedures.

6. Corporate Records Keeping Systems

Paper Records

All NICS Departments had a purely paper-based records management system until 2005. Certain documents are retained permanently in paper format and annual file reviews continue for those papers files still held.

Electronic Document and Records Management (EDRM) System

The NICS introduced the Tower Records Information Management system (TRIM) as its EDRM system in 2005. Since then it has been the corporate repository for the majority of information created and received by each NICS Department in the course of their duties: this includes emails that must be retained for business purposes as evidence of a decision or transaction carried out by or on behalf of the Government. It should be noted that in 2015 the EDRM system used by the NICS became known as HPRM after the software was bought by Hewlett Packard, and in 2020 became Content Manager after the software was acquired by Microfocus.

Shared Drives

Unfortunately, It is not technically feasible to store linked spreadsheets and databases in the EDRMS used by the NICS. These are stored on shared drives, which are carefully monitored to ensure that only nominated file types are kept in this way.

Line of Business Systems

Each NICS Department uses and maintains line of business systems for specific business requirements. These systems generate and hold data that must also be considered and managed in line with records management policies and guidance.

Other Collaborative Systems

Whilst other systems capable of generating records are utilised across the NICS, such as Microsoft Office 365 or WhatsApp it should be noted that these systems of software are not designed for use in record keeping and as such any records that are to be retained must be extracted and stored in the official EDRMS.

7. Retention and Disposal

Information and records must be held no longer than required to support each NICS Department in its business needs and legal obligations. Each NICS Department has developed detailed Retention and Disposal Schedules, which list record classifications and their retention periods. At the end of that time the records will be appraised by PRONI for permanent preservation. Those records that are selected by PRONI will be transferred to them. Those that are not will be appropriately disposed of. Full details of the retention and disposal process can be found in the NICS Retention and Disposal Policy.

8. Monitoring and Compliance

In order to ensure ongoing monitoring of compliance with this policy and supporting standards the NICS has developed a Records Management Governance Framework. This Framework details the roles and processes that will be utilised by NICS Departments to meet the requirements of good records management practices. Included is rolling Records Management health checks across all business areas and opinion from Internal Audit.

9. Training

The NICS has a programme of training to make sure that every member of staff is aware of their responsibilities with respect to records management and to ensure they can carry out their duties in this regard. This includes training in the use of any of the corporate record keeping systems detailed above relevant to their duties along with an understanding of organisational policies, procedures and guidance.

10. Policy Review

This policy will be reviewed annually. Unscheduled reviews will also take place in the event of significant change.