

Corporate Document & Records Management Policy

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Document Purpose	Policy Guidance
Document Name	Corporate Document & Records Management Policy
Author	Chloe Anderson-Wheatley
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Target Audience	FIG Directors; FIG Heads of Service, All FIG Employees
Description	Provide a framework for managing corporate records
Superseded Documents	Corporate Document & Records Management Policy (V.4)

Timing/Deadlines

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Document Status

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1 Introduction

- 1.1 All Falkland Islands Government (FIG) staff members must ensure that they are familiar with the contents of this policy, which outlines the standards of practice required in the management of Government corporate records. It is based on current legal requirements and professional best practice.
- 1.2 All organisations need to keep records, and the public would rightly expect that FIG maintains records on its activities and decisions that affect the social, economic and political development of the Islands.
- 1.3 Records and documents are different. A document is defined as the smallest unit of filing, and is often identifiable as it is a single letter, form or report. Records are the recorded evidence of policies and decisions created by FIG.
- 1.4 A record is defined 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 (BS ISO 15489-1:2016).
- 1.5 Records, regardless of form or structure, should possess the characteristics of authenticity (they are what they say they are), reliability (can be trusted as full and accurate), integrity (not be altered since created, last modified, approved or filed) and useability (can be retrieved, read and used) to be considered as evidence and meet requirements of business.
- 1.6 A record can be in various formats including: paper; electronic; email; social media; videos and telephone messages.
- 1.7 Records are important information assets to all organisations. Information is most valuable when it is up to date, accessible and accurate. Effective records management ensures that information is properly managed and available, in whatever format it is stored.
- 1.8 Records management is the field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records. By having frameworks in place, which provide evidence of actions and decisions taken, it ensures that FIG remains accountable and transparent, and that this information remains available for reference and use when required.

- 1.9 A record retention schedule is a controlled document which sets out the length of time records are retained for before final disposition action is taken (secure destruction or transfer to the Jane Cameron National Archives for permanent preservation). It applies to all information regardless of format upon which it was created or held. All staff should be familiar with their Department's retention schedule and apply the relevant retention period to the records.
- 1.10 A Corporate Document and Records Management Policy is essential to supporting and providing effective management of records. It will ensure that FIG securely keeps the records it needs for business, regulatory, legal and accountability purposes.
- 1.11 The purpose of this policy is to provide a framework on how FIG records are to be managed, and to provide staff with an overview of the procedures and legal obligations which apply to FIG records.

2 Background

2.1 FIG will take actions as necessary to comply with legal and professional obligations set out for records, and in particular:

- Access to Health Records Ordinance 1995
 - Committees (Public Access) 2012 Ordinance
 - Falkland Islands Government Data Protection Policy 2020
 - Falkland Islands Government Access to Information Code of Practice 2016
 - Falkland Islands Financial Instructions
 - Falkland Islands Government Management Code
 - Falkland Islands Government Corporate Record Retention & Destruction Policy 2023
- a. Access to Health Records Ordinance 1995 sets out the right to access health records of individuals to whom they relate and other persons, and to provide for the correction of inaccurate health records.
 - b. Committees (Public Access) 2012 Ordinance provides members of public the right to attend meetings and have access to relevant documents of certain committees. It also outlines the limitations to this access and restrictions which apply.
 - c. The Falkland Islands Government Data Protection Policy (approved in December 2020) and the Falkland Islands Government Access to Information Code of Practice 2016, states the decisions and procedures for providing access to information and responding to requests; including

procedures for accessing an individual's personal information held by FIG. These documents only apply to the FIG and other public bodies that FIG controls.

- d. The Falkland Islands Financial Instructions, updated annually, describes the roles and responsibilities for all officers concerned with finance, including the procedures for preparation of estimates; collection of revenue; payment of expenditure and maintenance of accounting records. The document also specifies the retention period for financial records retained by any FIG Directorate.
- e. Falkland Islands Government Management Code provides guidance on staff procedures and behaviour in regards to records created through employment, and disclosure of information. It also outlines disciplinary actions for staff that do not follow the code of conduct. This Code applies to all FIG employees.
- f. The Falkland Islands Government Corporate Record Retention & Destruction Policy, revised and approved by ExCo in 2023, outlines the procedures for retaining corporate records and processes for destruction at the end of that period, unless the record has continuing archival value.

2.2 Further documentation which can be used as guidance for records includes:

- BS ISO 15489-1: 2016 Information and Documentation - Records Management
 - Data Protection Act 2018
 - NHS Records Management Code of Practice 2021
- a. BS ISO 15489-1: 2016 Information and Documentation - Records Management, outlines the core concepts and principles for the creation, capture and management of records. It includes general details on: records control; records and record systems; policies and assigned responsibilities; appraisal; and processing records through stages of creation, capture and management. Though compliance with British Standards is voluntary, this document and its principles are set as an aspiration for FIG to work towards complying with.
 - b. The Data Protection Act 2018 is an Act of UK Parliament which regulates the processing of personal data relating to living individuals, including the obtaining, holding, use or disclosure of such information. In May 2018 the Act was passed by Parliament to repeal the previous Data Protection 1998 Act, to provide tighter controls on the management of personal data; including destruction and access to individual's information. Though this Act is not in force in the Islands, and the

previous Data Protection Ordinance repealed in 2012, it is listed as a matter of best practice until appropriate legislation is approved by Legislative Assembly.

- c. Health and Social Services Directorate (DHSS) can also find guidance from NHS England, for example the Code of Practice 2021 which sets out relevant frameworks and documentation on the management of health records. The DHSS also has a specific Document & Records Management Policy to support the capture and storage of health and clinical records – this was developed in conjunction with the Directorate and is available on their central system.

- 2.3 Failure to comply with the above regulations could result in reputational damage for FIG, and where relevant, legal action. This policy applies to all FIG employees and must be strictly observed.

3 Scope

- 3.1 Staff members of all FIG Directorates and Departments are within the scope of this policy.
- 3.2 This policy is also for any staff working in or on behalf of FIG – including contract workers, temporary/casual staff, or honorary appointees.

4 Roles and Responsibilities

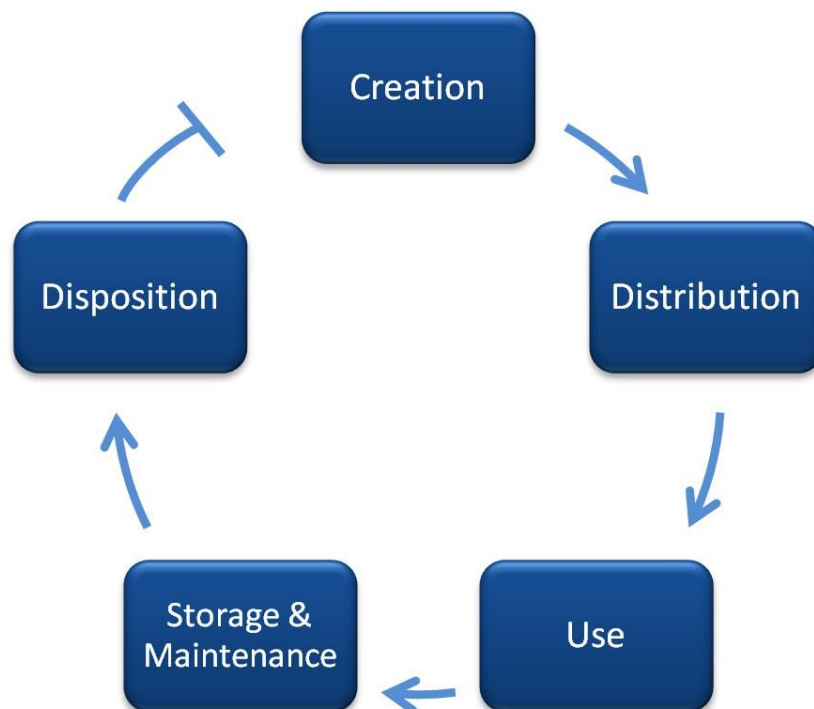
- 4.1 The Chief Executive through the Directors is accountable for the Records Management within FIG.
- 4.2 Directors are responsible for ensuring that the Directorate they are responsible for is managed in accordance with this policy and also for maintaining adequate records within the context, both legal and regulatory, of the business area their FIG Directorate operates.
- 4.3 The Director of Policy & Economic Development has lead responsibility for records management and maintaining this policy as an active document within FIG Departments.
- 4.4 The Records Manager has operational responsibility for the Corporate Document and Records Management Policy.
- 4.5 The Records Manager is also responsible for supporting a culture of high quality records management practise across FIG.
- 4.6 The Heads of Service and Office Managers for each Directorate are responsible for ensuring that records created by their respective FIG Directorates are stored securely and that access to them is controlled.
- 4.7 All staff members are responsible for keeping a record of business transactions or evidence of actions conducted as part of their duties for FIG. The record should be stored appropriately, a retention period assigned and access controls applied if necessary.

5 Corporate Level Procedures

- 5.1 This policy covers the management of both documents and records in FIG. The policy sets in place the strategic governance arrangements for all documents and records produced and received by FIG in accordance with agreed best practice as well as the principles established in BS ISO 15489 (International Standard for Records Management).
- 5.2 This policy is mandatory and applies to all information in all formats. It covers all stages within the information lifecycle including: creation; use; documents appraisal; declaration of record; record appraisal; retention and disposition.
- 5.3 Staff members must not alter, deface, block, erase, destroy or conceal records with the intention of preventing disclosure of information.
- 5.4 Staff members are expected to manage records about individuals in accordance with this policy irrespective of their race, disability, gender, age, sexual orientation, religion or belief, or socio-economic status.

5.5 Lifecycle Management

- 5.5.1 Records management plays a crucial role within FIG as it underpins effective information sharing with Government Directorates and externally to the public. The law requires that certain records are retained for a defined period however; records are used on a daily basis for internal purposes. Using the diagram below staff can learn more about each step in the Records Lifecycle.



- Step 1: Creation
This is the start to the cycle - when pen is put on paper, an entry is made onto a database or a new electronic document is opened. It can be created by employees within FIG or received from an external source. It must be complete, reliable, authentic, integral and useable.
- Step 2: Distribution
This stage is focused on managing information once it has been completed or received. It occurs when a record has been sent to someone for whom it was intended. Distribution includes: photocopy; photography; receiving by registered mail or by hand; receiving through email or email attachment.
- Step 3: Use
This is when records are actively used to support organisational decisions and transactions. The records are labelled as current or active.
- Step 4: Storage & Maintenance
At this stage records are not used on a regular basis and are being kept for legal or financial reasons until the retention period is complete. The storage and maintenance phase includes: filing; transfers; and retrieval. Records still remain accessible and can be used as points of reference to support decisions however; they should not be removed from the records management system. Records in this stage are known as semi current, or inactive.
- Step 5: Disposition
This stage is where the records are no longer needed for current business, have reached their retention period or have no continuing value. During this stage the records are reviewed to assess whether the record will be securely destroyed or, if it is of enduring/historical value, transferred to the Jane Cameron National Archives. This is the final stage of the Lifecycle.

5.6 Records Retention Schedule

- 5.6.1 Keeping unnecessary records wastes time, uses up valuable storage space and potentially incurs costs. In accordance with best practice and retention schedules records are not to be kept past the specified retention period.
- 5.6.2 Records should only be destroyed in line with Directorate's retention schedules. FIG therefore, needs to demonstrate that the destruction of records is in line with proper retention procedures.

- 5.6.3 The specified retention periods apply to the official or master copy of the records. Any duplicates which may be held in other Departments should be identified and kept for as short a period as possible.
- 5.6.4 Some types of records which may be created and kept locally are the responsibility of the local Department, but may be found under a different function on the retention schedule.
- 5.6.5 All Directorate, and Departmental, record retention schedules are available to access from the Corporate Records Management page on the FIG Intranet.
- 5.6.6 The Corporate Record Retention & Destruction Policy, and advice from the Jane Cameron National Archives, provides staff with guidance and procedures which are to be followed when retaining government records.
- 5.6.7 *Appendix 1* provides list of FIG offices, and their corresponding Directorate, responsible for retaining and managing the master copy of certain records. This information is reinforced via the Directorate's retention schedules.

5.7 Records Involved in Investigations, Litigation and Legal Holds

- 5.7.1 A legal hold, or litigation hold, requires employees to preserve and not destroy, or modify, records and information that are relevant to a pending or current lawsuit. This includes records on paper and electronic format.
- 5.7.2 Legal hold will be decided by the Director of the relevant Directorate, in line with the Management Code.
- 5.7.3 Once the period of legal, or litigation, hold is complete records are retained in accordance with the appropriate retention schedule. Any records which have subsequently reached the end of their retention period can go through the relevant disposition process.

5.8 Record Naming and Good Practice

- 5.8.1 Record naming is an important process in records management. In the absence of a formal FIG Naming Convention document, it is essential that where possible a unified approach is undertaken within FIG Directorates when naming/referencing records.
- 5.8.2 A proposed general file name convention is:

YYYYMMDD – DOCUMENT NAME [VERSION CONTROL] – JOB POSITION
INITIALS – DIRECTORATE.
- 5.8.3 As best practice for records captured and named within the records management lifecycle, dates should be written with the YYYY MM DD format.

- 5.8.4 Staff should refrain from naming folders or files with their own name unless the folder contains biographical files or concern a specified individual.
- 5.8.5 Version control is the management of multiple revisions to the same document. Version control enables us to tell one version of a document from another. It is important that records which require version control include details on: the updates which have been completed; the date it was updated; the author who amended it; and where relevant the date of review.
- 5.8.6 Primary electronic records, when possible, must be held within accessible shared drives rather than individual drives. This is to ensure that information remains accessible even when the owner is absent.

5.9 Record Maintenance

- 5.9.1 At present there is no interim storage area for paper records once they reach semi current stage.
- 5.9.2 The movement and location of paper records should be controlled to ensure that a record can easily be retrieved at any time. This will ensure that the original record can be traced and located if it is required.
- 5.9.3 Storage areas for paper records should be secure, and be in line with fire regulations. The conditions should provide an environment with minimum fluctuations in temperature and humidity, and ensure records remain dry and free from biological, external elements like rain.
- 5.9.4 Electronic records should be saved on shared drives if access is permitted, which have regular back-ups undertaken (See 5.8.6).

5.10 Record Access

- 5.10.1 FIG Access to Information Code of Practice sets out provisions for accessing information held by FIG and responding to requests. It also sets out provisions to provide individuals with the right to access information that FIG holds about them. This is also supported and further set out in the Data Protection Policy.
- 5.10.2 The FIG Information Systems Acceptable Usage Policy supports the protection of personal data and sets out the procedures for limiting unlawful access and disclosure of information, and the unauthorised holding of processing of personal data on FIG computers or private devices.

5.11 Record Closure

5.11.1 Current records should be closed when they become inactive and are no longer being actively used to support organisational decisions and transactions. These records then become semi-current/intermediate records and are retained until record disposition process.

5.11.2 The Corporate Record Retention & Destruction Policy, and advice from the Jane Cameron National Archives, is available on the Intranet along with Directorate's retention schedules to provide instructions on applying timescales and ensuring that records are not kept for longer than is necessary.

5.12 Record Appraisal

5.12.1 Appraisal refers to the process by which a Directorate identifies whether a record is worthy of permanent preservation and sent to the Jane Cameron National Archives.

5.12.2 The purpose of appraisal is to ensure records are examined at the appropriate time to examine whether or not they are worthy of archival preservation, or should be securely destroyed.

5.12.3 Appraisal should only be undertaken after consultation with the National Archivist at the Jane Cameron National Archives.

5.13 Record Transfer

5.13.1 Records which are no longer active are selected for archival preservation and should be transferred to the Jane Cameron National Archives. This must be authorised by the National Archivist to ensure there is adequate storage for the records.

5.14 Record Disposal

5.14.1 Disposal is the implementation of appraisal and review decisions. It is not the same as destruction; though records may be selected for secure destruction they may also have custody transferred to the Jane Cameron National Archives.

5.14.2 Records should not be kept for longer than retention periods and should be disposed of once the disposition process is complete.

- 5.14.3 Accounts of staff members who have left employment with FIG will be deleted immediately unless there are extenuating circumstances. This will utilise server space and ensure that records are not held in excess of their retention period. However, appropriate business critical or records identified under Departmental Record Retention Schedules should be captured.
- 5.14.4 Details on processes for destruction are also available in the Corporate Record Retention & Destruction Policy.
- 5.14.5 Short lived documents which are not essential correspondence, such as telephone messages, notes on pads, post-its, do not need to be kept as records. If they are business critical, where appropriate, they should be transferred to a more formal document which should be saved as a record.
- 5.14.6 For reasons such as efficiency and to address problems of storage space, staff may undertake scanning of paper records into electronic format. However, due to the nature of scanning this process should be well considered, and where appropriate, discussed with Director before continuing. Guidance on digitisation process is available from the Records Manager.
- 5.14.7 Staff involved in scanning paper records into electronic format with the purpose of discarding the original, should be aware of the retention details of the particular record and if necessary get advice from the Records Manager and National Archivist prior to destruction.

5.15 Records Security

- 5.15.1 All FIG staff with identifiable data or commercially sensitive data must save it with the appropriate security measures (for example Restricting Editing).
- 5.15.2 Staff should not use home email accounts or private computers to hold or store sensitive records or information which relates to business activities of FIG.
- 5.15.3 When printing paper records, in particular sensitive documents, staff must ensure that measures are taken to collect material once it has been sent to the printer.
- 5.15.4 Never leave your computer logged on when unattended. It should be locked and secure.
- 5.15.5 Portable devices such as laptops must also be kept secure and where possible, locked away out of office hours to prevent unauthorised access.
- 5.15.6 Information Systems Acceptable Use Policy provides further guidance on security for electronically held records.

- 5.15.7 For confidential or sensitive records ensure that there are controls in place for only authorised staff members to access records, and that retrieval is monitored.
- 5.15.8 Records should be secured in locked storage facilities, such as filing cabinets and lockable drawers, to further control access and security. Any sensitive or confidential records are not to be left on desks unattended during the day or overnight but should be stored in the secure facilities. Where possible a clear desk policy should be adhered to ensure that information is not accessed or read by unauthorised persons.
- 5.15.9 Office spaces and areas, including internal and external entrances, should be secure from unauthorised access; particularly during out of office hours to further protect confidential or sensitive records.
- 5.15.10 Electronic records should have appropriate access permissions in place to ensure that only authorised staff can view, use and edit relevant documents.

6 Distribution and Implementation

- 6.1 This document will be made available to all staff via FIG's Intranet and made available to new staff at FIG Induction sessions.
- 6.2 A notice will be sent to all Directors and Heads of Service informing them of the documents release.
- 6.3 Supporting guidance and information related to the procedures outlines in the policy are available on dedicated Corporate Records Management page on the FIG Intranet:

<https://intranet.gov.fk/files/Page/Corporate%20Records%20Management.aspx>

7 Associated Documentation

7.1 The following documents on the Intranet will provide additional information:

Title	Version
FIG Corporate Record Retention & Destruction Policy	2023 Edition
FIG Data Protection Policy	2020 Edition
Falkland Islands Government Access to Information Code of Practice	2016 Edition
Falkland Islands Financial Instructions	2020 Edition
Information Systems Acceptable Use Policy	2022 Edition
FIG Management Code	2022 Edition
Archives Accession Policy for Government Departments	2022 Edition

7.2 Further information and authoritative updates on legislative obligations can be found on the Falkland Islands Legislation website: <https://www.legislation.gov.fk/>

7.3 The Records Manager holds the electronic versions of the following standards:

- BS ISO 15489-1:2016 *Information and documentation - Records management Part 1: Concepts and principles*

8 Version Control Tracker

8.1 Version control information is as follows:

Version Number	Date	Author Title	Status	Comment/Reason for Issue
1.0	2018.09.26	Policy Assistant	Approved by ExCo	New Policy (ExCo 109/18)
2.0	2019.06.24	Policy Assistant	Approved by CMT	Replace references to Public Folders; Update Associated Documentation
3.0	2021.08.16	Records Manager	Approved by CMT	Update Background section (2) and listed Associated Documentation (7.1); Update records security section (5.15) Update policy lead information
4.0	2022.08.29	Records Manager	Approved by CMT	Updated background section (2); record naming and good practice (5.8); record access (5.10); records disposal (5.14); records security section (5.15) and associated documentation (7)
5.0	2023.08.14	Records Manager	Approved by CMT	Update on introduction (1) and background section (2); retention of record (5.6), record closure (5.11), record disposal (5.14) and associated documentation (7) to reflect new policy on record retention and destruction; guidance on file naming (5.8); reference to Intranet page for further guidance (6); general update on associated documentation (7).

8.2 The Policy & Economic Development Unit is responsible for overseeing and updating the version control amendments for this document.

9 Appendices

Appendix 1: Corporate Records Master Copy List

The below table sets out the responsible Department and Directorate for managing, storing and retaining the master copy of certain corporate records created by FIG. This information is also set out in the Directorate FIG Record Retention & Destruction Policy.

If these documents are held by other Directorates they are classified as duplicates, and not the official version.

Name of Record	Responsible Department	Responsible Directorate
Standing Finance Committee Papers & Minutes	Treasury	Financial Secretary
Executive Council Papers & Minutes	Legislature	Chief Executive's Office
Corporate Management Team Papers & Minutes	Chief Executive's Office	Chief Executive's Office
Strategic Oil Group Papers & Minutes	Chief Executive's Office	Chief Executive's Office
Legislative Assembly Papers & Minutes	Legislature	Chief Executive's Office
Environmental Committee Papers & Minutes	Policy & Economic Development	Policy & Economic Development
Historic Building Committee Papers & Minutes	Planning & Building Services	Development & Commercial Services

Public Accounts Committee Papers & Minutes	Treasury	Financial Secretary
Fisheries Committee Papers & Minutes	Fisheries	Natural Resources
Planning & Buildings Committee	Planning & Building Services	Development & Commercial Services
FIG Contracts & Tenders	Contracts, Tenders & Major Projects	Development & Commercial Services
Land Sales & Deeds	Registry	Attorney General's Chambers
Legislation Records	Legal Services	Attorney General's Chambers
Lands Committee Papers & Minutes	Legal Services	Attorney General's Chambers
FIG Statutory Appointment records	Legislature	Chief Executive's Office
FIG Staff/Personnel Records – including signed contracts, payroll, P Files.	Human Resources	Human Resources
Education Board Committee Papers & Minutes	Director of Education Admin	Education
Police Committee Papers & Minutes	Royal Falkland Islands Police	Emergency Services & Islands Security

Mineral Resources Committee Papers & Minutes	Mineral Resources	Mineral Resources
Building & Planning Applications	Planning & Building Services	Development & Commercial Services
Falkland Islands Gazettes & Supplements	Legal Services	Attorney General's Chambers
Immigration Applications and Customs records	Customs & Immigration	Emergency Services & Islands Security
Housing Committee Papers & Minutes	Public Works Admin	Public Works
FIG Housing Tenancy Agreements	Public Works Admin	Public Works
FIG Press Releases	Communications Office	Policy & Economic Development
Census Reports	Policy & Economic Development	Policy & Economic Development
FIG Economic Development Policies	Policy & Economic Development	Policy & Economic Development

