Records Management Policy

DQ Status	Approved	Policy
DQ Content Authority	General Counsel (Nicholas Eldred) and Head Of Information Policy & Compliance (James Leaton Grey)	
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Description	This document incorporates Freedom of Information requirements as well as all information held in the former Core Records Policy and the Records Management Standards. The policy defines the way BBC records and information should be managed to standards which ensure that vital and important records are identified, that the Corporation holds records that are necessary, sufficient, timely, reliable and consistent with operational need, and that legal and regulatory obligations are met. It also defines the roles and responsibilities for the creation, safekeeping, access, change and disposition of information. Also available on bbc.co.uk	

DQ Reference	Version	Date	Last Reviewed
i&a_20	1.4	18/05/2005	August 2010
Key Words	Records, core records, retention, archive, media management		
DQ Location	Internal: http://guidelines.gateway.bbc.co.uk/dq/media_management/records_management.shtml External: http://www.bbc.co.uk/guidelines/dq/contents/archives.shtml		

BBC Core Records Management Policy

Executive Summary

Managing BBC records, in whatever format, to agreed standards is essential if those records are to be available and used in the future. Freedom of Information and Data Protection legislation have put greater emphasis on the BBC's ability to make information available to the public. All records and information need to be managed in line with charter, legal, business or heritage obligations and be accessible, accurate, kept in good condition and either held permanently or disposed of in a timely fashion as appropriate. All staff should be aware of the value of their records and information and relevant legislation and regulations governing their use and retention.

This policy defines the way BBC records and information should be managed to standards which ensure that vital and important records are identified, that the Corporation holds records that are necessary, sufficient, timely, reliable and consistent with operational need, and that legal and regulatory obligations are met. It also defines the roles and responsibilities for the creation, safekeeping, access, change and disposition of information.

Six key principles are set out which are supported by records management standards and guidelines.

i.   All information created during the course of normal BBC activity is the property of the BBC. Every employee has a duty of care to responsibly and adequately manage the records they create or use. A structure for records management best practice and advice will be provided. This will include the provision of managed systems, the establishment of record-keeping systems, the provision of standards and guidelines for corporate record keeping and the establishment of retention and disposal rules. Appropriate resources will continue to be provided for records management as detailed in The Lord Chancellors Code of Practice under section 46 of the Freedom of Information Act 2000 (part 1 section 7).

ii.   Information must be managed to support business processes rather than hierarchical or organisational structure. The functions and activities that create each record are identified and the value and business needs established. This allows an assessment to be made on whether a record is core to the BBC or not. It also allows a decision on the length of time that the record should be kept and its possible archival value.

iii. Records should be held in a managed system and should be accurate, up to date and accessible. This can be achieved by the capture of metadata and record owners being aware of any restrictions on access.

iv.   Records must not be retained, distributed or copied unnecessarily. The corporate retention schedule, available on gateway, helps with this by setting appropriate retention periods, identifying master holders of records and giving reasons for destruction of records.

v.   A consistent approach should be adopted with regard to the creation, indexing, storage, retrieval, revision, archiving and disposal of records. The use of the functions and activities model, and the corporate retention schedule will allow this. It is vital, that when establishing a new system Information & Archives are consulted. This will enable this level of consistency to be achieved ultimately providing greater efficiency and better information access.

vi.   The management of information must be in accordance with security, protection, legal, environmental and cost issues. Efficient records management enables the organisation to manage risk and thus reduce the number of incidents in business continuity and business critical areas due to not being able to find core records, the risk of not being able to use the records as legal submissions and reduce the risk of not meeting statutory requirements.

Context

The effective management of all recorded information across the Corporation is essential for the BBC to operate efficiently. Within a framework of legislative compliance and best practice, records management is a core obligation for the business.

Annually the BBC creates millions of records as part of its day to day business. Managing this information to agreed standards as it is created (and throughout its lifecycle) is essential if those records are to be understood or used in the future. The availability, re-usability and life of the record depend on it being managed according to its context and value.

Freedom of Information and Data Protection legislation put great emphasis on an organisation's ability to make information available to the public, as well as appropriate processing of personal and sensitive personal data. These legislative obligations highlight the need for an effective framework for information and records management to be in place throughout the organisation as a mechanism for managing and retrieving information on demand and ensuring the appropriate processing of personal and sensitive personal data.

Scope

This policy and its supporting guidelines and tools are for the use of all BBC staff. The obligation of all staff is to recognise that the information they create or use on a daily basis have a value to the BBC as information assets. This carries with it a responsibility to manage those assets on behalf of the BBC in line with charter, legal, business and heritage obligations and to ensure that records are accessible, accurate, kept in good condition and either held permanently or disposed of in a timely fashion as appropriate.

This policy applies to all recorded information, regardless of format, that documents the output of, or relates to, the BBC's actions and transactions during its business activities.

Records are evidence of business transactions or decisions which are fixed in time. They contain content (information), context and structure. The use or re-use of the information that changes any of these three factors results in the creation of a new record of a different transaction.

Policy Statement

This policy defines the way BBC records and information should be managed to standards which ensure that there are methods available for:

- The identification of information and the classification of records of value and importance that merit special attention;
- Assessing the quality and quantity of information such that records held by the Corporation are necessary, sufficient, timely, reliable and consistent with operational need;
- Determining the proper use of information in accordance with legal and regulatory obligations and defining the roles and responsibilities for the creation, safekeeping, access, change and disposition of information.

Key Principles:

To meet the demands of the policy it is essential that all staff understand and practice the following principles when managing their recorded information regardless of its format:

i.   All information created during the course of normal BBC activity is the property of the BBC. Every employee has a duty of care to responsibly and adequately manage the records they create or use.

ii. Information must be managed to support business functions rather than hierarchical or organisational structure.

iii. Records should be held in a managed system and should be accurate, up to date and accessible.

iv. Records must not be retained, distributed or copied unnecessarily.

v.   A consistent approach must be adopted with regard to the creation, indexing, storage, retrieval, revision, archiving and disposal of records.

vi. The management of information must be in accordance with security, protection, legal, environmental and cost requirements.

vii. Records deemed to be "Restricted Data" will require appropriate additional security (see definition in section 1.1 below).

These key principles are supported by standards and guidelines published by BBC Information and Archives (I&A) and Information Security, both part of FM&T.

1.0 Responsibility for records management

(See also Appendix B)

1.1 Duty of care

All BBC staff must take responsibility for the management of the information that they create or use. It is essential that staff recognise and understand the value of their records and the relevant legislation and regulations governing their use and retention.

The availability of information to staff and public alike is dependent on the accessibility of that information. Information is only accessible if it is managed from the point of creation. The creator of the record is best placed to understand the content of the record and its likely value in the context of business, legal or heritage use (archival or historical value).

All BBC staff should be aware of several classes of data that may be designated as "Restricted Data" and the need to apply appropriate measures to ensure its security. From the perspective of this policy "Restricted Data" are any data that, if lost, could cause harm.

Restricted Data includes (but is not limited to) the following: Confidential data, Personal data (Data Protection Act (DPA) term defined in appendix C), Sensitive Personal Data (DPA term defined in Appendix C), Contract information, Talent Information, Staff Information, Broadcast information; Broadcast media; BBC projects; and Business information.

The BBC presently requires that any Restricted Data in Transit or held on Portable Electronic Devices is to be encrypted.

See the BBC's Data Encryption Policy for more details:
http://guidelines.gateway.bbc.co.uk/dq/is/data_encryption.shtml

1.2 Corporate Records Management

The BBC will provide a structure for records management best practice and professional advice available to all divisions. This will enable the BBC to ensure that vital corporate records are managed adequately and will provide a route to the archive for valuable or historical records.

Where appropriate managed services will be available for key record creators to assist in the establishment of fit for purpose record keeping systems as required.

Records management staff will endeavour to benchmark against industry standards and best practice and establish compliance guidelines for all corporate recordkeeping.

The responsibility for establishing retention and disposal rules for corporate records lies with the records management function.

1.3 Records Management Staff

The BBC will continue to provide appropriate resources for records management as detailed in The Lord Chancellors Code of Practice under section 46 of the Freedom of Information Act 2000 (part 1 section 7).

2.0   Understanding Business Processes

It is essential when establishing recordkeeping systems that the system reflects the underlying functions of the organisation rather than the organisational structure. This will provide continuity to the system and allow records to be classified in a context that will hold longevity beyond hierarchical or structural change.

2.1 Functions, Activities, Transactions

The BBC has adopted a Functions and Activities model for assessing the value of records (Transactions) produced. This model sits independently of corporate or divisional structures and allows a business process map to be created for the corporation. This model identifies overlapping business processes and allows the identification of key record creators and holders.

This model therefore provides a knowledge map for the Corporation. As such it underpins the corporate retention schedule and the associated file/record classification schema. All recordkeeping systems should reflect this model.

2.2 Assessing Value

It is accepted that some records have greater value to the organisation than others. Having established the business process (function & activity) that created the record it is necessary to establish the record's value.

Records should be assessed according to the following criteria (see Appendix A for definitions):

- Business value
- Legal value
- Administrative value
- Historical value

Records are then classed according to business need:

- Vital.
- Important
- Useful
- Non-essential

Establishing the value and business needs for a particular record type allows an assessment to be made on the length of time that the record should be kept and its possible archival value (as a permanent historical record). This retention assessment establishes if the record is core to the BBC or not. The use of retention schedules is detailed in section 4 below.

3.0   Accuracy and Accessibility

3.1   Accuracy

Good management of records ensures the user has confidence in the validity and accuracy of the information. The creation of supporting data about the record (metadata) establishes a records context and its place in time. I&A have established standards for minimum metadata requirements, broadly these are:

- Author/creator
- Record title
- Subject & keywords
- Description
- Date of creation & (if necessary) of any transaction relevant to the record's authenticity
- Format (electronic records must be retained in a format which enables them to be rendered with the structure (including layout, formatting and other elements) intact. This information should also be retained when migrating to new software environments.)
- Records series association. Sufficient information about the business context, in which records are created and used, should be maintained to enable records to be understood when they are retrieved. Retaining the content of a document is not sufficient. Association of the records series to a retention schedule will provide this context.
- Version
- The links between records, which document a sequence of activity, must be preserved. For example, an electronic mail message that is a reply to a previous one should contain the previous message or a reference to it.
- Security Marking (where appropriate)

3.2   Accessibility of records

Records need to be available to all those who need to access them. Capturing detailed metadata will allow both current and future users of records to determine if they contain the information they require or not. As legislation such as Data Protection and Freedom of Information Acts put greater pressure on the organisation to make information available, it is more important than ever that this tool is used.

Some information must be kept restricted, for example contract information, talent information, personal or sensitive personal data, confidential business information or material that may bring undue media attention the BBC. It is essential that those responsible for managing records are aware of any access restrictions that may apply and take appropriate action to protect those records.

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4.0   Retention, Disposal, Copying

4.1 Retention Schedules

I&A have established a corporate retention schedule for use by all staff. This follows the principles outlined in section 2 above. The BBC retention schedule is derived from work completed with the various divisions across the BBC, and is available on gateway via the Delivering Quality website:

http://guidelines.gateway.bbc.co.uk/dq/media_management/corporate_retention_schedule.shtml.

The BBC retention schedule has been designed according to the Functions, Activities, and Transactions model.
This means that users of the retention schedule database will be able to:
- Identify the *functional* area of the BBC in which they work.
- Highlight the key record keeping *activities* which they are responsible for.
- Provide examples and subject definitions for the *transactional* records that they create, in order to achieve policy compliance.
- View examples of the record types they create and see the appropriate retention periods. This will ensure that information is either destroyed at the appropriate time or deposited with the archives for permanent preservation.

The key benefits of this approach are:
- Users will retain core records relevant to their area of work - the remaining records can be considered non business critical.
- Master sets of records will be clearly defined and the holders clearly identified in the retention schedule maintained by I&A, thereby creating a mechanism for the elimination of duplicate records.
- Users will be given clear guidance on the length of time for which their records must be retained.
- A 'Knowledge map' of business critical information will be created by I&A.
- The individual business areas will meet essential statutory and BBC Charter requirements.
- The BBC can dispose of, in a suitable manner, all records which are not defined as Core Records which will include duplicate records (copies of core records), and non-core records.

4.2 Records disposal

The importance of timely records disposal in line with retention periods set by I&A is a fundamental principle of good records management. It is also underlined by Data Protection and Freedom of Information legislation, the former stating that data should not be kept longer than necessary.

It is, however, essential that information is kept about records that have been destroyed and why. The retention schedule acts as part of this record.

4.3 Copying

The efficient and timely disposal of records is hampered by copying. It is vital that copies of records are kept to a minimum and that these are destroyed once their business need has passed.

The retention schedule details master set holders for core records.

5.0   Consistency

When creating a recordkeeping or management system in whatever format it is essential that a level of uniformity is achieved throughout the organisation so that changes to the structure of the organisation have little or no effect on the consistency of the corporate memory. As detailed above the Functional model and the tools for record classification and retention allow this.

It is vital, therefore, that when establishing a new system I&A are consulted. This will enable this level of consistency to be achieved ultimately providing greater efficiency and better information access.

The rules and tools established for traditional paper based systems apply equally to the management of electronic information either as shared drive filing systems or electronic content or records management systems (ERMS).

6.0   Risk Management

Efficient records management enables the organisation to manage risk and thus:

- Reduce the number of incidents in business continuity and business critical areas due to not being able to find core records.
- Reduce the risk of not being able to use the records as legal submissions.
- Reduce the risk of not meeting statutory requirements.
- Prevent unauthorised access to restricted data fidential information.

There are many legal requirements that the BBC needs to satisfy. Sometimes these are explicitly defined but more usually it is left to the organisation to satisfy itself it is minimising risk & following best practice.

Some examples of where legislation and records management overlap are found in the following table (this is by no means an exhaustive list. Please refer to the Regulatory Legal Department if further assistance is required.):

Legislation	BBC Contacts
Freedom of Information Act	Policy and Legal, Information Policy Compliance Team: Contacts located http://policyandlegal.gateway.bbc.co.uk/FOI/index.html
Data Protection Act (DPA)	Policy and Legal, Information Policy Compliance Team: Contacts located http://policyandlegal.gateway.bbc.co.uk/FOI/index.html
Civil Evidence Act	Litigation Department : Contacts located http://home.gateway.bbc.co.uk/legal-adviser/Legal_Directory/litigation.html
Communications Act	Regulatory Legal Department : Contacts located http://home.gateway.bbc.co.uk/legal-adviser/Legal_Directory/regulatory.html
Companies Act	Corporate Legal and IP Department Contacts located http://home.gateway.bbc.co.uk/legal-adviser/Legal_Directory/CLIP.html
Finance Act	Group Financial Controller: contacts located http://finance.gateway.bbc.co.uk/people_fin.html
Employment legislation (e.g. Race Relations Act, Sex Discrimination Act, Employment Protection Act)	Litigation Department : Contacts located http://home.gateway.bbc.co.uk/legal-adviser/Legal_Directory/litigation.html
Control of Substances Hazardous to Health Act	Corporate Safety : Contacts http://safety.gateway.bbc.co.uk/contact_map.htm
Factories Act	Corporate Safety : Contacts http://safety.gateway.bbc.co.uk/contact_map.htm
Human Rights Act	Regulatory Legal Department : Contacts located http://home.gateway.bbc.co.uk/legal-adviser/Legal_Directory/regulatory.html
Copyright, Designs and Patents Act	Corporate Legal and IP Department Contacts located http://home.gateway.bbc.co.uk/legal-adviser/Legal_Directory/CLIP.html
BBC Charter	Regulatory Legal Department Contacts located http://home.gateway.bbc.co.uk/legal-adviser/Legal_Directory/regulatory.html
Broadcasting Act	Regulatory Legal Department Contacts located http://home.gateway.bbc.co.uk/legal-adviser/Legal_Directory/regulatory.html

This Records Management policy will establish a pan BBC approach to both risk definition and best practices for the legal requirements that the BBC needs to meet.

7.0   Policy Compliance

A system for monitoring policy compliance will be introduced via audit; current processes for information audits highlight areas of risk and recommend best practice methodology for improvements to record keeping systems.

Supporting Documentation

I&A Standards and Guidelines

Records Management Standards for the BBC

Electronic Records Management Systems Functional Requirements

Bibliography/References

BS ISO 15489-1: 2001 *Information & Documentation – Records Management part 1*

BS ISO 15489-2: 2001 *Information & Documentation – Records Management part 2*

DISC PD 0025-2: 2002 *Effective Records Management Part 2: Practical implementation of BS ISO 15489-1*

Hendley, T. *Document, Content and Records Management Guide*, Cimtech Ltd 2003

Code of Practice on the Management of Records by Public Authorities…pursuant to section 46 (6) of the Freedom of Information Act 2000, The Lord Chancellors Office

Appendix A

Definitions of Record Value & Record Status

Value

- o *Business Value* - value in terms of contribution to business operation, includes business critical, strategy and policy records.

- o *Financial Value* - refers to records documenting receipt and use of funds, particularly financial transactions such as expenditure, revenue and costs.

- o *Legal Value* – value in terms of showing compliance with regulatory and statutory requirements including records associated with the Charter. E.g. contracts

- o *Administrative Value* – records used for administrative purposes only e.g. leave forms, absence returns, room bookings

- o *Historical Value* - information that records the history or development of the corporation and broadcasting environment, and may be of use for future research.

Status

- o *Vital* Records essential to the continuing operation of the BBC and those records which protect the rights and interests of the corporation, employees, customers and the public. e.g. contracts, pasbs

- o *Important* Records necessary for the continuing operation of the BBC and which may contain information to support vital records or may be of a corporate or historical value. E.g. policy, talent management

- o *Useful* Records which may be vital or important to the department but are of little value to the corporation. May be of historical value. E.g. correspondence

- o *Non-essential* Transitory correspondence, purely informational with a very short time value. Includes internal announcements, notice of employee activities, routine business activities, invitations to work-related events and internal requests for information.

Appendix B

Roles and Responsibilities for Records Management

Area of responsibility	Group responsible
Management of records	All BBC staff
Policy ownership	Information & Archives
Devise standards and best practice for records management	Information & Archives
Manage Retention Schedule	Information & Archives
Advise on establishing recordkeeping systems	Information & Archives
Advise on retention and disposal of records	Information & Archives
Advise on value and importance of records	Information & Archives
Archival storage	Information & Archives
Information Audits	Information & Archives

Appendix C

Personal Data

Personal Data is considered to be Restricted Data under this policy.

Personal Data is defined by the Data Protection Act as data relating to a living individual who can be identified:

(a)   from those data, or

(b)   from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller (as defined in section 1(1) of the DPA), and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

For clarity the following must always be encrypted:

•   All documents holding data where distress might result from the misuse or disclosure of that data, including data on major talent salaries, Sensitive Personal Data (as defined below) and information that could be used in identity fraud attempts;

•   All Children's contact details. This includes any data where children could be identified from the information (including personal addresses, email addresses, telephone numbers, gaming aliases, school names, names of sports teams and specific contact details); and

•   Documents including individuals' financial information. (E.g. Bank or credit card details.)

Sensitive Personal Data

Sensitive Personal Data is specifically defined by the Data Protection Act and means personal data consisting of information as to:

- the racial or ethnic origin of the data subject (as defined in section 1(1) of the DPA),
- their political opinions,
- their religious beliefs or other beliefs of a similar nature,
- whether they are a member of a trade union (within the meaning of the [1992 c. 52.] Trade Union and Labour Relations (Consolidation) Act 1992),
- their physical or mental health or condition,
- their sexual life,
- the commission or alleged commission by the data subject of any offence, or

- any proceedings for any offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings.

Document circulation

Version Number	Created On	Author/Contributor	Circulation	Comments
0.1 draft	25/9/03	Gavin Siggers (GS)	Chris Wilkie (CW), Adam Lee (AL), Nick Watson (NW) (25/9/03)	AL 29/9/03 NW 26/9/03
0.2 draft (minor amendments & inclusion of appendix A)	8/10/03	GS,NW , Jacquie Kavanagh (JKa)	CW, AL, NW, JKa, Keith Little, John Good (JG), Alison Heighton(AH), Steve Jupe, (SJ) Helen Rowlands (HR), Simon Pickard (SP) (8/10/03)	NW 9/10/03 AH 10/10/03 CW 13/10/03 JG 16/10/03 HR 20/10/03
1.0 final	26/11/03	GS	Sarah Hayes (SH), AH,CW	
1.1 amended	18/05/05	SJ	N/A	Post DQ review
1.2 draft	17/04/2008	NW/Iain Gibson (IG)	JKa, SJ, SP, Julia Harris (JH)	To include main points from Data Classification Policy
1.3 amended	21/05/2008	NW	JKa, SJ, SP, JH, IG	To include comments on 17/04 changes.
1.4 draft	02./07/2010	NW/WW	IPC, JH, AS	To include main points from Data Encryption Policy