

## HEFCW's Information Management Policy Statement

HEFCW recognises the importance of maintaining and managing its information in an efficient and effective manner, to ensure that it has captured vital records for operational use, detailed corporate knowledge and evidence which underpins policy making, and sufficient evidence for accountability.

HEFCW is committed to documenting its business activities with records that are complete, authentic, reliable, secure and accessible, and will manage all information in accordance with relevant legislative requirements throughout their lifecycle, from planning and creation to ultimate disposal.

### 1. Scope of the Information Management Framework

This document provides the framework through which efficient management of information can be achieved and audited.

The framework and supporting documentation applies to all information, in any format or media, created, received, maintained or held by HEFCW and its employees in the course of carrying out its business activities.

It includes, but is not limited to, all electronic files (shared/personal files, emails, databases, HR system, Finance system, website, intranet, extranet), paper based documents (including drafts, hand-written notes, annotated copies), media (audio, video, backup tapes CDs, DVDs), diaries, faxes, brochures, microfiche, microfilm, photos and digital images.

The framework and supporting documentation applies to all permanent and temporary employees, contractors, secondees and others who have access to, create, receive or store any HEFCW information.

HEFCW owns all information created by employees carrying out business related activities.

### 2. Defining 'Information' and 'Records'

'Information' is a collective term for all knowledge, data and resources. Information can be defined as:

*"Organised or manipulated data, which has theme and meaning but that is not necessarily evidence of an event or decision"*

'Records' are a subset of information; all records are information but not all information are records.

The recognised definition<sup>1</sup> of a record is:

*“Information created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business”*

In other words, a record is information that documents an action, a policy or a decision.

A substantial amount of information is created and maintained in various HEFCW ICT systems. The challenge for employees is in identifying the information that must be kept as a record in accordance with the Classification and Disposal Schedule, from the information that does not need to be retained. However, the Freedom of Information Act draws no distinction between records and information and thus all information must be managed properly.

### **3. Roles and responsibilities**

Every employee must ensure that all the information they are responsible for is managed in accordance with the framework and supporting documentation.

The Chief Executive has overall responsibility for ensuring that information is maintained appropriately and that sufficient records are retained to protect HEFCW's interests and its stakeholders.

The Head of Corporate Services is the Departmental Records Officer (DRO), responsible directly to the Chief Executive for the development and monitoring of the framework and supporting documents, and that information is maintained in accordance with the framework throughout its lifecycle. The Head of Corporate Services also has responsibility for the management of ICT services and its compliance with legislation.

The Head of Information Systems and Facilities is HEFCW's Records Manager, responsible for developing and updating the framework and supporting documentation in compliance with all relevant legislation, addressing any information related issue, managing the electronic records management systems and onsite/offsite storage, overseeing the operation of the disposal schedule including the destruction of information and the permanent preservation/transfer of records, undertake compliance and monitoring audits, and ensuring all employees are aware of the framework and their record managing responsibilities and receive appropriate training. The Head of Information Systems and Facilities also has responsibility for managing the digital continuity of information throughout its lifecycle and ensuring the availability, long-term integrity, confidentiality and security of all information stored electronically on HEFCW's ICT systems.

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<sup>1</sup> Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000 and BS ISO 15489 Information and documentation – Records management

Director/Heads of Teams are responsible for ensuring employees follow the framework and supporting documentation, the accuracy, completeness and integrity of all records that their teams are responsible for, and encourage good information security and management practices amongst teams.

#### **4. Supporting documentation**

The Information Management Framework consists of the following supporting documents:

- Records Management Guidance
- Information Management Guidance (to be developed)
- Classification and Disposal Schedule
- Protective Marking System
- Transfer to Public Repositories
- Electronic Records Management System Guide
- Digital Continuity Guide

The following policies and procedures offer specific guidance on information and records and must also be followed:

- Information Security Policy
- Data Protection Guidance
- Access to Information
- Acceptable Use Policy
- Business Continuity Management Policy
- Staff code of conduct
- Procurement guidelines

#### **5. Review, monitoring and compliance**

The framework will be reviewed by the Records Manager every three years or after a major organisational, legislative or technological development. Implementation and compliance of the framework will be monitored by the Records Manager who will report to DRO. The Head of Internal Audit will undertake a periodic review to assess overall compliance with the framework.

#### **6. Contact**

For further information regarding the framework and supporting documentation, please contact the Head of Information Systems and Facilities.

## Legislative and Regulatory Requirements

HEFCW is required to meet statutory and regulatory requirements in the management of its information. There are also a number of Standards and Codes of Practice that have been sanctioned by Government. These requirements and best practices have been incorporated into the Information Management Framework and supporting documentation and in the development of the electronic records management system and processes.

### Acts of Parliament

- Public Records Acts 1958 and 1967
- Government of Wales Act 1998
- Data Protection Act 1998
- Electronic Communications Act 2000
- Freedom of Information Act 2000
- Environmental Information Regulations 2002
- Human Rights Act 1998
- Computer Misuse Act 1990
- Electronic Communications Act 2000
- The Electronic Signatures Regulations 2002
- Copyright, Designs and Patents Act 1998
- Copyright (Computer Programs) Regulations 1992
- The Employment Practices Data Protection Code: Part 2 Employment Records v1.0 2002
- The Employment Practices Data Protection Code: Part 3 Monitoring at Work v1.0
- Telecommunications Act 1984
- Reuse of Public Sector Information Regulations 2005
- Health and Safety At Work Act 1974
- Companies Acts 1985 and 1989
- Government White Paper 'Modernising Government'
- Cymru Ar-Lein

### Codes of Practice

- Open Access – the Code of Practice on Access to Government Information
- Lord Chancellor's Code of Practice on the management of records issued under Section 46 of the Freedom of Information Act 2000
- The Lord Chancellor's Code of Practice on the Discharge of Functions of Public Authorities under Part I of the Freedom of Information Act 2000
- National Assembly Code of Practice on Public Access to Information 2001
- PD0010 The Principles of Good Practice for Information Management 1997

## BSI and ISO Standards for Best Practice

- BS ISO 15489 Information and documentation – Records management 2000
- BS 4753 Storage, transportation and maintenance of media for use in data processing and information storage 1998
- BS 5454 Storage and exhibition of archival documents 1989
- BS 10008 A Code of Practice for Legal Admissibility and Evidential Weight of Information Stores Electronically 1999
- ISO 27001 Information Security Management System 2005
- ISO 22301 Business Continuity Management 2012 (formally BS 25999)

## The National Archives (TNA) Guidance

- Guide 1 - What is records management? (August 2010)
- Guide 2 – Organisational arrangements to support records management (August 2010)
- Guide 3 – Records management policy (August 2010)
- Guide 4 – Keeping records to meet corporate requirements (August 2010)
- Disposal scheduling (March 2004)
- Accounting records retention schedule (March 2006)
- Building records retention schedule (June 2004)
- Central expenditure records retention schedule (March 2003)
- Complaints records retention schedule (June 2004)
- Contractual records retention schedule (June 2004)
- Employee personnel records retention schedule (January 2012)
- Information management records retention schedule (September 2002)
- Internal audit records retention schedule (March 2003)
- Press and public relations records retention schedule (March 2002)
- Projects records retention schedule (June 2004)
- Suitable file formats for transfer of digital records to The National Archives (September 2011)
- Understanding digital continuity v1.2
- Managing digital continuity v1.2
- Embedding digital continuity in information management v1.2
- Guidelines on developing a policy for managing email (March 2004)

## Useful websites

[The National Archives](#)

[Legislation by the The National Archives](#)

[Information Commissioner's Office](#)

[Freedom of Information Act 2000](#)

[Data Protection Act 1998](#)

[Environmental Information Regulations](#)

[Reuse of public sector information regulations 2005](#)

[Welsh European Funding Office \(WEFO\)](#)

[Information and Records Management Society](#)

[The Cabinet Office](#)

[Information Assurance Advisory Council](#)

[CESG](#)

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0.1	05/12/12	Draft presented to MB
0.2	11/12/12	Approved by MB 05/12/12. To be EIA'd 17/01/13
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Policies, procedures and guidelines are available on line, in large print and electronically on CD. Should you or someone you know require any of our documents in an alternative format please contact us on 029 2076 1861.