# Corporate Policy | Service Instruction

## SI0419

# Records Management

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| **Classification** | **OFFICIAL [PUBLIC]** |

The purpose of this Service Instruction is to deliver a consistent approach to Records Management across the Police Service of Northern Ireland (PSNI), establish requirements designed to help Staff meet legal obligations relating to Records Management and to manage records so that their value as a corporate resource is fully protected,exploited and fully utilised within the applicable legal framework.

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# 1. Introduction

The Police Service of Northern Ireland (PSNI) is committed to the implementation of an effective and efficient records management programme.

PSNI will manage its records to comply with its legal, statutory and other obligations including, but not limited, to:

- The College of Policing's Applied Professional Practice APP/MoPI Code of Practice;

- The Data Protection Act 2018;

- Freedom of Information Act 2000;

- Protection of Freedoms Act 2012, and

- Other relevant legislation and industry standards.

PSNI aims to present a consistent and clear approach to the; creation, use, management, review disposal and preservation of records, in line with the PSNI Retention and Disposal Schedule.

# 2. What is a Record?

A record can be described as recorded information, in any format or media, created or received and maintained as evidence by the PSNI in the transaction or pursuance of its business.

# 3. What is Records Management?

Records management is the term used to describe a function by which the Organisation seeks to control the receipt, creation, retrieval, storage, preservation or disposal of its records.

Effective records management will enable the PSNI to:

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| **Know** | • What records it has;<br>• Where those records are;<br>• How secure records are;<br>• How long records should be retained. |
| **Effectively** | Manage the whole record through the life cycle. |
| **Access** | Records when required, providing timely information for operational need. |
| **Provide** | Secure and legally admissible records demonstrating accountability. |
| **Ensure** | Records, particularly those containing personal or sensitive information, are not retained for longer than is legislatively, legally or administratively necessary. |
| **Store** | Records securely and efficiently, and retain historical records of past activity to provide a corporate memory.  Records should be stored on-site, within the PSNI estate, where possible, only when all other options have been exhausted should external storage facilities be used.  Such storage whether onsite or offsite must be fit for purpose and safe from unauthorised access, meet fire regulations and provide reasonable protection from water, rodent or other damage, at the same time permitting maximum approved accessibility to the information and commensurate with its frequency of use. |
| **Make** | Best use of space and storage facilities both physically and electronically. |
| **Optimise** | Use of Staff time. |

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| **Improve** | Control over records. |
| **Comply** | With legislation, national guidance and PSNI policy. |
| **Reduce** | Costs. |
| **Maintain** | Reputation and public confidence in policing. |

## 4. Police Service Northern Ireland Commitment

The PSNI is committed to implementing all appropriate measures, procedural, physical and digital, which are designed for the effective management of records.

| **Police Service Northern Ireland Commitments** | |
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| **Ownership** | The Service will understand what records it has, where those records are, how long it requires to retain the records, and how secure the records are;<br><br>Ownership of all records will be clear across all business units and based on the premise 'If you own the function you own the record';<br><br>All records created during the course of day-to-day business are owned by the PSNI and not the individual who created them. |
| **Managing** | • All records and the associated related components of the record through the record life cycle, to include:<br><br>   o Comprehensive service wide record review processes across all functional areas and systems; |

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| | o The preservation of archival records, "i.e. those records with a historic, social and cultural interest". |
| **Ensuring** | • Its record keeping is carried out in a manner which accurately documents the functions of the PSNI and is compliant with associated policy;<br><br>• Procedures, guidance and training are available to assist staff in producing records which reliably represent accurate information that is used in, or created by, the business process and which will enable reliability, integrity and authenticity to be demonstrated;<br><br>• Activities relating to records management from creation to appraisal are adequately resourced;<br><br>• The PSNI's approach is clear and accessible to those who may be affected by this issue and that they are in a position to exercise their rights under the Data Protection Act 2018 and other applicable legislation;<br><br>• That all records are captured and maintained in such a way that their evidential weight and integrity are not compromised at any time;<br><br>• Digital continuity will be considered for the systems and formats that are used to store digital records. |
| **Adopting** | • The record management principles of 'records management by design and by default' in the consideration of all process and technology designs, and implementations;<br><br>• The principal of record ownership based on function including historic records i.e. 'If you own the function you own the record'; |

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| | • One corporate Electronic Document and Record Management Solution System (EDRMS) across the PSNI for the management of all unstructured documents, emails etc. |
| **Implementing** | • Sufficient infrastructures, both digital and estates, capable of storing, managing and sharing, all required hard copy and digital records for the periods specified within the Service Retention and Disposal Schedule. |
| **Appointing** | • Information Asset Owners (IAOs) to each business area/system to ensure that PSNI information assets are accessed, controlled and managed accordingly;<br><br>• Trained personnel to carry out record review. |

## 5. Roles and Responsibilities

| Roles and Responsibilities | |
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| **All staff** | • Records management principles will be understood by all Staff and Officers in the Service and embed a culture of personal responsibility and accountability;<br><br>• Creating records which are consistent, reliable, accurate and complete;<br><br>• Identifying records which are relevant to their business function or content;<br><br>• Prior to leaving the PSNI, Officers/Staff must; |

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|  | o Transfer all digital records from personal file shares to corporate storage; |
|  | o Return all notebooks journals and daybooks in accordance with the relevant Service Instruction; |
|  | o Return all hard copy records they hold to their Supervisor; |
|  | • Recognising e-mails which are corporate records and filing accordingly; |
|  | • Capturing records which authentically document business activities; |
|  | • Storing records in the appropriate area digitally and/or in physical storage; |
|  | • Applying security and access controls to records, where appropriate; |
|  | • Ensuring that searching, viewing and browsing records is done only for PSNI business purposes; |
|  | • Finalising documents when appropriate to ensure they become PSNI records; and |
|  | • Applying appropriate disposal and retention actions to records based on the PSNI Retention and Disposal Schedule with an understanding by all officers and police staff that police records belong to the Service and must not be disposed of without formal prior approval. |
| **Records Manager** | • The Records Manager will publish records management policies and procedures, and the provision of guidance on the principles of retention. |
| **Record Officers** | • The purpose of this role is, while centrally managed, to work in a devolved environment, as the local records management representative, with IAOs and record reviewers to provide records management advice and guidance |

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| | required to enable local teams to manage their records from creation, use, maintenance, storage and eventual disposal in both the physical and electronic environments. |
| **Information Asset Owners** | • Ownership of the business record normally lies with the Head of each business area, who automatically becomes the IAO for their business area upon their appointment.<br><br>• IAOs are senior members of staff involved in running the relevant business and/or system.  Their role is to be responsible for records management by understanding what information is held, understanding what is retained and what is destroyed, how information is moved, and who has access and why. As a result, they are able to understand and address risks to the information, ensure that information is fully used within the law for the public good and provide written input to the SIRO on the security and use of their asset. |
| **Senior Information Risk Officer** | • The Senior Information Risk Officer (SIRO) has overall responsibility for the organisational function of records management. |

# 6. Statutory Legislation and Guidance

There are a number of pieces of legislation that impose the need for effective management of all PSNI records, both paper and electronic.

The PSNI will ensure that the appropriate processes and resources are put in place

to enable compliance with the appropriate Legislation:

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| Public Records Act (NI) 1923; |
| Disposal of Records Order 1925 |
| Data Protection Act 2018 |

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| General Data Protection Regulations 2018 |
| Lord Chancellor's Code of Practice on the Management of Records under Section 46 of the FOI Act 2000 |
| Environmental Information Regulations 2004; |
| Criminal Procedure and Investigations Act 1996 |
| Human Rights Act 1998. |

Also where appropriate, comply with Guidance issued by the:

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| Public Records Office Northern Ireland |
| National Police Chiefs Council; |
| National Archives; |
| Information Commissioner's Office; |
| College of Policing; |

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| Northern Ireland Civil Service. |

# 7. Access and Security

The PSNI remains committed to delivering openness and transparency of records. Everyone should consider and be equally mindful of ensuring sensitive and/or records containing personal information are appropriately restricted and only accessible to the relevant individuals, groups or business area.

Staff are personally responsible for the safekeeping of records in their possession and should ensure they are only accessed and processed in line with business needs.

# 8. Review Retention & Disposal

The PSNI is obliged to define how long records need to be kept. As a general principle records should be kept for as long as they are needed for reference, accountability, compliance with regulatory requirements or to protect legal and other rights and interests. It is not appropriate nor proportionate to retain records 'Just in Case'.

Review, Retention & Disposal provides a common and consistent approach within the overall management of police information and seeks to balance proportionality and necessity.

**The Schedule**

This review, retention & disposal schedule identifies the arrangements for records created by the PSNI and complies with the requirements in the Public Records Act (NI) 1923 and the Disposal of Documents Order (S.R. & O.1925 No 167).

Records must not be kept after they have ceased to be of use unless:

- They are known to be the subject of litigation or a request for information. In such circumstances disposal should be delayed until the litigation is complete or in the case of the request for information until all relevant complaints and appeal provisions have been completed;

- The records have long-term social, historic or research value. This should be identified in the schedule and agreed with the Public Records Office.

The benefits of the PSNI using the schedule are:

- It allows the management of records to be consistent and compliant;

- The Service can be confident that records are disposed of at the appropriate time; and

- Records are not being maintained and stored unnecessarily.

## 9. Responsibility for Historical Records

A record becomes historical when it reaches 20 years old and has been deemed to have permanent value for legal, administrative, Social, historical or research purposes. These records will be protected by the PSNI in consultation with the Public Record Office of Northern Ireland (PRONI).

The records selected for permanent or long-term preservation are outlined in the PSNI Review Retention & Disposal Schedule and will either be retained by PSNI on its estate or transferred to PRONI. Once transferred, these records become the responsibility of PRONI.

## 10. E-Mail

The principles of this policy apply equally to e-mail and it is necessary to transfer e-mails relating to business activity and transactions to the appropriate area of the corporate EDRMS to ensure a complete and accurate representation of the record.

## 11. Scanning Projects

It is acknowledged that there is a role for the principles of scanning within the management of Service records.  In the context of this document, scanning is defined as the conversion of PSNI physical documents or records into digital format.  It applies to everyone working in the PSNI and all new scanning projects must adhere to PSNI guidance to ensure PSNI meet legislative requirements linked to this information.

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## Appendix A Contact Us

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