

Police Service of Northern Ireland

~~Abstract — All staff have a responsibility to ensure that the principles outlined in this Policy Directive are adhered to~~

HQ Ref: RM 01/05 (Policy)

PD 06/04

POLICY DIRECTIVE

RECORDS MANAGEMENT POLICY

1. POLICY IDENTIFICATION

POLICY TITLE: Records Management Policy

POLICY OWNERSHIP:

**DEPARTMENT
BRANCH**

Operational Support
Corporate Development,
Records Management Unit

POLICY APPROVED BY:

**CCF REF/OTHER
DATE OF APPROVAL**

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2. POLICY STATEMENTS

(1) Policy

- (a) The Police Service of Northern Ireland (PSNI) is committed to ensuring that all appropriate measures are put in place to ensure that it is able to effectively manage the records it creates and receives. This involves ensuring that records are created, registered, stored, retained, disposed of or preserved indefinitely in an efficient manner consistent with organisational business needs.
- (b) The Policy applies to all records created or received by the PSNI, irrespective of the district/department within which the records are maintained. Records form part of the corporate memory of the Service and are a valuable resource in ensuring the Service is able to meet accountability and legislative requirements.
- (c) Records created during the course of the day-to-day business of the PSNI are owned by the PSNI and not by an individual. Therefore all records should be managed in accordance with the procedures set out in this Policy Directive.
- (d) The PSNI will ensure that the appropriate processes and resources are put in place to enable compliance with the Public Records Act (Northern Ireland) 1923, the Data Protection Act 1998, and the Freedom of Information Act 2000. The PSNI will also ensure, where appropriate, it complies with guidance issued by Public Records Office Northern Ireland, National Archives, Association of Chief Police Officers, the Information Commissioner and the Northern Ireland Civil Service.
- (e) The PSNI will endeavour to ensure that all staff are aware of their responsibilities with regards to the creation and management of records. All staff will be given appropriate training depending on their role.
- (f) The ACC Operational Support will monitor compliance with this Policy.
- (g) Monitoring the performance of Districts/Departments will rest with the respective District Commander/Head of Department in implementing the procedures issued in conjunction with this Policy Directive.

(2) Definitions

(a) Record

- (i) A record can be defined as recorded information created, received or maintained by the PSNI as part of its day-to-day business and kept as evidence of a decision or action that was undertaken.
- (ii) The term 'record' can refer to information recorded by any means in the form of words, symbols, images or impressions. It can exist in either electronic or physical formats.
- (iii) Records are maintained by the PSNI because they are deemed to be worthy of preservation and provide evidence of whether the organisation or individuals within the organisation have met defined legal, organisation and social obligations.

(b) Document

- (i) A document can be defined as structured units of recorded information, in hard copy or electronic format.
- (ii) While the term record, most commonly refers to documents, it should be noted that not all documents are necessarily records. Documents need to meet specified criteria before they should be considered a record. That is, the document should provide evidence of a transaction, decision or action, which is worthy of preservation.

(c) Records Management

- (i) Records Management can be defined as the 'organisational function of managing records to meet business needs, accountability requirements and community expectations'. In practical terms records management addresses the lifecycle of records, from the point of creation or receipt, through to their maintenance, use, final disposition or indefinite retention.
- (ii) Records Management provides the necessary mechanisms to ensure that records are retained for as long as necessary ensuring, that they can be retrieved, protected from being lost or damaged and that access to them is controlled in accordance with business needs.
- (iii) A comprehensive records management programme ensures that organisations can meet accountability and legislative requirements, increase their administrative efficiency, reduce their running costs and improve their decision-making processes.

3. INTRODUCTION

(1) Drivers for Change

- (a) Given the substantial volume of information produced within modern day organisations on a daily basis, and the need to ensure fast and accurate retrieval of information, an effective records management programme is essential.
- (b) Almost every function within the PSNI necessitates the creation and management of records. Over the last 10-15 years traditional record keeping disciplines based on the management of physical files has been seriously eroded. This situation has emerged due to continuing resource pressures, as well as changes in the way in which information is created and stored. The move towards electronic methods of creating and storing information has largely occurred without the supportive measures necessary to ensure that information is managed effectively.
- (c) Obligations under the Freedom of Information Act, Data Protection Act, and the Code of Practice on the Management of Police Information 2005 place additional pressure on the PSNI with regards to the creation and management of records. Compliance with these pieces of legislation is dependent on an understanding of the type of information created, how it is managed and where it is located. Records management therefore, plays an essential role in ensuring that the PSNI is able to meet its commitment to being open, accountable and transparent.

(2) Purpose

- (a) The aim of this Policy is to outline the PSNI's approach and commitment to the implementation of an effective and efficient records management programme. It aims to present a consistent and clear approach to the creation, review, use, management, disposal and preservation of records.
- (b) The Policy will endeavour to:
 - (i) support the vision and objectives of the Police Service of Northern Ireland;
 - (ii) ensure standard policies and procedures are in operation throughout the organisation for the management and control of all records; and
 - (iii) meet the requirements of relevant legislative drivers.
- (c) An effective records management programme not only establishes good habits and practices it also guarantees the quality and reliability of records produced within the organisation.

(3) Scope

In order to address the requirements necessary for good records management the Policy will:

- (a) define roles and responsibilities with regards to records management;
- (b) outline the methods for creating and managing records;
- (c) present a structured method for the filing and retrieval of information; and
- (d) identify methods for managing the retention and disposal of records.

(4) Legal Basis

(a) As previously stated there are a number of legislative drivers that necessitate the creation and management of records within the PSNI. The sections below provide a brief overview of the legislation that governs records management.

(b) Public Records Act (Northern Ireland) 1923

- (i) The primary legislation governing public records is contained in the Public Records Act (Northern Ireland) 1923. The Act established the Public Records Office of Northern Ireland (PRONI) as the body primarily responsible for the receipt and preservation of public records.
- (ii) The Act defines a public record as 'those records of any court, government department, authority or office in Northern Ireland with respect to which the government of Northern Ireland has the power to make laws' [Section 1(2)(a)]. The Act not only refers to the preservation of physical records but includes the preservation of those records stored in electronic formats.
- (iii) Alongside the Public Records Act is the Disposal of Documents Order (Northern Ireland) 1925. This Order sets out guidelines for managing the retention and disposal of records. The Order establishes the criteria for the creation of retention schedules within public authorities.

(c) Criminal Procedure and Investigations Act 1996

This Act places a duty on all police officers to ensure that where a criminal investigation is conducted all reasonable steps are taken for the purposes of the investigation. This includes ensuring that information which is obtained in the course of the investigation and which may be relevant to the investigation is recorded and retained.

(d) Freedom of Information Act 2000

- (i) The Freedom of Information Act provides the public with the right to access all types of 'recorded' information held by public authorities. The Act seeks to encourage greater openness and accountability across the public sector and to empower people in their dealings with public authorities.
- (ii) The Act comes into force on 1 January 2005 and will be applied retrospectively. Members of the public, including individuals and organisations will have a right to request information from a statutory body, to be told if the information is held and to have it supplied provided it does not fall into one of the exemption categories.
- (iii) The Lord Chancellor's Department has issued a 'Draft Code of Practice on the Management of Records under Section 46 of the Freedom of Information Act'. This Code sets out the necessary requirements for an effective Records Management programme and is designed to assist public authorities in meeting their obligations.

(e) Data Protection Act 1998

The Data Protection Act 1998 sets out regulations for the processing of information relating to individuals. It imposes a duty on those holding personal data to comply with eight data protection principles, to register with the Data Protection Registrar, as well as provide individuals with the right to access information held about them and if necessary to have information relating to them corrected.

(f) Environmental Information Regulations 2004

The Environmental Information Regulations provide the public with a statutory right to request environmental information from public authorities. The new Environmental Information Regulations come into effect on 1 January 2005 and are designed to compliment the Freedom of Information Act, which provides a general right to access information held by public authorities.

(g) The Code of Practice on the Management of Police Information 2005

The MoPI guidance sets out a framework for the management of police information based on the principle that effective policy is dependant on efficient information management. As such the guidance is based on considerable work over many years on defining policing, processes and national standards.

4. IMPLICATIONS OF THE POLICY

(1) Corporate Standards

- (a) This Policy is designed to standardise the creation and management of records across the PSNI. Previously, records have tended to be managed according to the individual needs of districts/departments, with no consistent approach to the creation, review, maintenance, dissemination or disposal of records.
- (b) Application of this Policy will require some districts/departments to change some of their current business processes. The additional administration is deemed necessary to ensure that policies are compliant with current legislation.
- (c) The Policy seeks to deliver a standard approach to records management, which ensures that there is a corporate knowledge of information created across the PSNI, and that there is consistency in the way in which this information is managed.

(2) Training

- (a) The Police College of Northern Ireland will be responsible for providing staff with appropriate training in records management.
- (b) Upon joining the PSNI all staff will be provided with training in the creation and management of records, as part of their induction programme.

(3) Consultation

This Policy has been distributed for consultation with:

- (a) Chief Constable/Deputy Chief Constable;
- (b) ACC's/Heads of Departments;
- (c) Legal Adviser
- (d) Head of IIB;
- (e) Corporate Diversity Manager;

- (f) Human Rights Adviser;
- (g) CPOSA/Superintendents' Association/PFNI/NIPSA;
- (h) District Commanders; and
- (i) Head of Training.

5. HUMAN RIGHTS/UNCRC/EQUALITY/CODE OF ETHICS/FREEDOM OF INFORMATION

- (1) The Policy and accompanying Procedure are deemed to be Human Rights compliant and has no UNCRC issues. The Policy has been screened for Section 75 considerations and complies with the PSNI Code of Ethics, in particular officers responsibilities under Article 1.9.
- (2) The Policy is suitable for public disclosure in accordance with the Freedom of Information Act 2000.

6. REVIEW

The ACC Operational Support is responsible for reviewing the contents of this Policy on an annual basis.

SECTION 7

PROCEDURES

1. (1) ROLES AND RESPONSIBILITIES

- (a) A successful records management programme requires support and recognition from all staff members within the PSNI. All staff have a responsibility to ensure that the principles outlined in this Policy Directive are adhered to.
- (b) The paragraphs below outline defined organisational responsibilities for records management within the PSNI.

(2) Records Manager and Deputy Records Manager

- (a) The legislation governing records management requires the appointment of designated members of staff, with appropriate seniority to have responsibility for records management. In order to comply with its legislative responsibilities the PSNI has appointed a Records Manager and Deputy Records Manager. Based within Operational Support, the Records Manager and Deputy Records Manager are assisted in their role by associated support staff.

- (a) The main responsibilities of the Records Manager and Deputy Records Manager can be summarised as follows:

- (i) monitoring and auditing the creation and management of all records within the PSNI;
- (ii) ensuring the organisation complies with the relevant legislative requirements in relation to records management;
- (iii) drafting and maintaining records management policies and procedures;
- (iv) providing advice and guidance to districts/departments;
- (v) overseeing records management training programmes;
- (vi) monitoring the regular review and destruction of records in compliance with the PSNI Review, Retention and Disposal Schedule;
- (vii) liaising with PRONI with regards to the review and transfer of records;
- (viii) monitor the use of the PSNI file plan by TRIM users throughout the PSNI; and
- (ix) ensure records are stored appropriately taking into consideration the security classifications.

(3) Records Auditors

- (a) Given the large volume of information that is created and maintained by the PSNI, a number of designated posts have been established to undertake the audit responsibilities as required in paragraph 7 below.

- (b) The main responsibilities of the Records Auditors can be summarised as follows:

- (i) liaising with and providing advice to districts/departments concerning records management including record retention periods, record destruction or record transfer in compliance of the PSNI Review, Retention and Disposal Schedule;
- (ii) performing record management audits in accordance with paragraph 7 of this Policy; and

- (iii) reviewing the content of their specific Intranet and Internet sites.

(4) Records Reviewers

- (a) In order to ensure the effectiveness of the PSNI's records management programme, each district/department will have a designated Records Reviewer. In some instances, depending on the size and operational need, a district/department may have a number of nominated Records Reviewers.
- (b) Records Reviewers have delegated authority to manage information within their areas to ensure consistency. The Records Reviewer will be the authority on records management within their district/department and will assist the Records Manager and Deputy Records Manager in all aspects of records management.
- (c) The main responsibilities of the Records Reviewer can be summarised as follows:
 - (i) creating folders; this includes the creation of both electronic and physical folders;
 - (ii) liaise with Privilege Users in assigning of appropriate security and access control measures;
 - (iii) liaising with Records Auditors with regard to the review and disposal of records;
 - (iv) providing assistance and advice to staff on records management issues;
 - (v) reviewing records in order to determine the appropriate retention period;
 - (vi) destroying or transferring records in accordance with this Policy and the PSNI Review, Retention and Disposal Schedule.

(5) All Staff

- (a) All staff participating in the creation of documents and records have a responsibility in ensuring they comply with the guidance set out in this document.
- (b) Briefly, this includes the following:
 - (i) ensuring that documents containing information of a corporate or operational nature are managed appropriately;
 - (ii) ensuring that documents and folders adhere to naming convention guidance; and
 - (iii) ensuring that the Records Manager/Deputy Records Manager or nominated Records Reviewer is informed of issues affecting the creation and management of records.
- (c) Prior to leaving PSNI, staff are reminded of their responsibility with regards to record and information management. All files should either be transferred to their line manager or to the corporate system.
- (d) Responsibility for all record management activities will be clearly defined within role descriptions.

2. RECORD CREATION AND MAINTENANCE

(1) Records

- (a) As previously stated a record can be defined as recorded information, which provides evidence of a transaction, decision, action or process. A record can either be created internally or received from an external source.

- (b) Records can exist in either electronic or physical format and includes, but is not limited to, the following:
- (i) written documents (consisting of one or multiple pages);
 - (ii) email messages;
 - (iii) drawings, maps, plans or graphs;
 - (iv) photographs; and
 - (v) audio or video recordings.
- (c) Records are maintained by an organisation because they have ongoing value and enable the organisation to meet legislative and public accountability requirements.
- (d) In order to ensure that information held by the PSNI meets the requirements that define records, it is essential to ensure the following conditions are met:
- (i) **the record is present** – that is, the information needed to reconstruct activities and transactions that have taken place is captured;
 - (ii) **the record can be accessed** – that is, it is possible to locate the information and present it in a way that is true to the original presentation of the information;
 - (iii) **the record can be interpreted** – that is, a context for the information can be established, showing when, where and who created it, how it was used and how it is related to other information;
 - (iv) **the record can be trusted** – that is, the information and its representation exactly matches that which was actually created and used, and its integrity and authenticity can be demonstrated beyond reasonable doubt; and
 - (v) **the record can be maintained** – that is, the record can be deemed to be present and accessed, interpreted and trusted for as long as necessary, irrespective of its location and method of transmission.
- (e) Once created, a record cannot be altered and can only be destroyed or deleted in compliance with the PSNI Review, Retention and Disposal Schedule.

(2) Record Types

- (a) Records created and received by the PSNI fall into two broad categories:
- (i) **Operational Records** – this covers records associated with the normal discharge of police business;
 - (ii) **Administrative Records** – this covers information essential for the day-to-day administrative running of the PSNI.
- (b) While records within both these categories contain information of varying importance, it is essential that they are managed within a consistent and controlled environment.

(3) Electronic Records

- (a) Increasingly, the PSNI uses electronic methods to create, transmit and store records. At a basic level, electronic records can be defined as records communicated and maintained via electronic equipment.

- (b) Documents created electronically should be treated in the same way as a traditional paper document in determining if it should become a record. That is, an electronic document created either internally or externally should provide evidence of an operational or administrative transaction, decision or action.
- (c) Email systems contain information regarding business activities and transactions, which like records in hardcopy format, need to be managed and retained in accordance with organisational and legislative requirements. Traditionally, email messages have not been recognised as records and have therefore been poorly managed. As a consequence, a large number of organisational records have been lost. In order to prevent the further loss of information, email messages should be saved using the same rules that identify other record types.
- (d) Where an email is considered a record it must be saved to the corporate file plan.

The file plan structure employed in the Common Terminal has the advantage of managing documents and messages relating to the same subject within a single folder and making them available within a shared environment.

- (e) Email generated or received within the PSNI can be divided into two main types:
 - (i) **operational/administrative emails** – relate to the business of the PSNI and must be retained as a record. Examples include the provision of advice to either internal or external sources, or authorisation to undertake a particular course of action; and
 - (ii) **ephemeral emails** – facilitate the business of the PSNI but do not need to be retained for business purposes. Examples include meeting arrangements or copies of minutes circulated for information purposes;
- (f) Responsibility for storing emails within the file plan depends on where they originate from. Emails created internally should be saved by the originator of the email, whereas emails received from external sources (i.e. outside the PSNI) should be saved by the recipient.
- (g) In many cases an individual email forms part of a larger exchange. To preserve the content and context of an email message it is essential to ensure that it is accompanied by relevant supporting messages. This involves saving the entire conversation thread (that is both sent and received messages) as a record within the file plan. The absence of supporting messages can make it difficult to guarantee that the email is a complete and accurate record.
- (h) As with other record types, emails can potentially contain multiple documents. These often take the form of attachments that accompany the email message. Where appropriate attachments should be saved into the file plan alongside the original message. Alternatively, in some instances it may only be necessary to save the attachment, as the email message has no value as a record.
- (i) It should be noted that legal documents and payments documents, which require a signature should be retained in hardcopy, rather than electronic format. Similarly, in accordance with guidance issued by PRONI, electronic records subject to permanent preservation should be printed to paper.

(4) **Creating Records**

- (a) Documents that meet any of the following criteria fall within the definition of a record and should therefore be managed appropriately:
 - (i) contains unique or valuable information developed in preparing reports, policies, etc;
 - (ii) reflects actions undertaken in conducting organisational business;
 - (iii) outlines organisational policy and the rationale for decisions or actions undertaken by the organisation;

NOT PROTECTIVELY MARKED

- (iv) documents oral exchanges (in person, by telephone or email) during which policy decisions are taken or activities are planned or completed;
 - (v) documents important meetings;
 - (vi) facilitates scrutiny of the organisations actions and decisions by both internal and external bodies; and
 - (vii) protects the financial and legal rights of the organisation and its clients.
- (b) In determining whether a document should be declared a record the following questions should be asked:
- (i) does it document the reasons for a particular course of action?
 - (ii) does it document why something was rejected or approved?
 - (iii) does it document why something has or has not been done?
 - (iv) does it document who was involved in undertaking a decision or completing a piece of work?
- (c) Examples of documents that should be declared as records either at the point of receipt or finalisation includes, amongst other things: case work, policy statements, correspondence, meeting minutes, contracts, accounts and statistical reports.
- (d) Registering Electronic Documents**
- (i) Responsibility for determining the significance of a document as a record will rest with the document author. Document authors will also be responsible for ensuring that documents and records are placed into the appropriate subject folder within the Common Terminal file plan.
 - (ii) Generally documents exist in two states; draft and published. Draft documents can be defined as those requiring additional information or amendment before being shared. Documents of this nature should either be saved into the author's personal directory or where appropriate, a designated folder within the file plan.
 - (iii) Published documents can be defined as those that have reached the final version stage and can be stored within a shared environment. Personal directories must not be used to store published documents.
 - (iv) The publishing of a document results in its declaration as a record. Documents can only be described as published, and therefore, complete and accurate once they have been saved into the appropriate folder within the file plan classification.
 - (v) The documents' declaration as a record can occur either at the point of creation or a later date. The document author retains responsibility of the document until it is declared a record. Once it becomes a record however, the document passes into corporate ownership.
 - (vi) However, circumstances may arise which require a published document to be updated or amended. Rather than simply incorporating changes into the existing record an entirely new version of the document should be created. This ensures that the integrity of the original record is maintained and acts as an audit mechanism in tracking the development of the document over time.
- (e) Registering Physical Documents**
- (i) All incoming correspondence and documents which need to be retained in hardcopy format due to reasons of legal admissibility and accountability should be registered. Documents should be placed on the appropriate physical folder in date order and numbered chronologically.

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- (ii) It is the responsibility of the person who creates or receives the document, files it or ensures that someone else files it. Where the document is passed on to someone else for filing, the document creator or recipient must provide details of the folder on which the document is to be placed upon. Similarly, in instances where a new folder is to be created the creator or recipient should detail the code and title to be assigned to the folder.

(5) Managing Documents/Records on Internet/Intranet

- (a) The effective control of Internet and Intranet documents is an important aspect of good records and information management. It is imperative that these Service documents/records are properly managed.
- (b) Information appearing on the Intranet and Internet sites must be kept updated, both with its content and its links to other information.
- (c) The Service has clear policy guidance on publishing items on the Service Internet and Intranet. These should be strictly adhered to.
- (d) Regular content audits of Internet and Intranet sites by the content authors are recommended. The content audit should take place every 6 months in order to ensure that the content is up to date and relevant.

3. FOLDER CREATION AND MAINTENANCE

(1) Defining the Common Terminal File Plan

- (a) A file plan can be defined as a systematic and logical arrangement of folders into functions or subjects based on defined relationships. It enables documents relating to a specific subject to be grouped and managed together.
- (b) The Common Terminal file plan has been designed to facilitate access and prevent the loss of information, by enabling information related to a specific subject to be grouped and managed together.
- (c) The file plan structure is organised and arranged in a manner that reflects the principle activities of the PSNI. To promote consistency and standard practices within the Service all districts/departments utilise a similar folder structure. This ensures that records are managed in the same way across the PSNI.
- (d) Documents should be allocated to the appropriate folder within the hierarchy at the point of being declared a record. In assigning a document to a folder, staff need to be mindful of the implications of their filing actions. All staff have a responsibility for ensuring that documents relating to the same business activity are grouped together so that a logical and clear narrative of events is established.

(2) Creating Electronic Folders

- (a) Folders are created at various levels within the file plan and enable information with common characteristics to be grouped within a logical structure. In effect folders facilitate the management of records in accordance with organisational and legislative requirements.
- (b) To ensure the ongoing manageability of the file plan, the ability to create new folders will be restricted to the Privilege User. Staff requiring a new electronic folder should consult their Privilege User. The Privilege User will be responsible for ensuring that the folder is titled in accordance with naming convention guidance and that where necessary the appropriate access restrictions are placed on the folder.
- (c) All users have a responsibility for ensuring that documents relating to the same business activity, decision or transaction are grouped together within the relevant folder so that a logical and clear narrative of events is established.

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- (d) All staff will not use home computers to create, manipulate or store information relating to police business. All information created electronically must be stored on PSNI IT systems.

(3) Creating Physical Folders

- (a) As previously stated physical folders should be created to manage documents received from external sources and, internally created documents which for reasons of accountability and legal admissibility need to be retained in hardcopy format.
- (b) All physical folders should be registered and should be assigned an appropriate category code, which reflects the subject of the folder content. Additionally, the folder cover should contain an index of all the documents the folder contains for ease of reference.
- (c) Physical folders must be maintained in a neat and organised manner to enable information to be accessed quickly and efficiently. This entails ensuring that:
 - (i) documents are filed in chronological date order, with the most recent date at the top;
 - (ii) there are no loose papers;
 - (iii) all paper clips and pins are removed and that papers are attached using plastic ended bar tags;
 - (iv) only a single copy of the document is placed on the folder and that information is not unnecessarily duplicated; and
 - (v) copying of documents onto several different files is kept to a minimum.
- (d) All physical folders should be clearly labelled and should reflect the exact title used during registry.
- (e) All folder movements must be recorded as soon as a folder is transferred from one physical location to another. It is the responsibility of the staff member in possession of the folder to record to whom or to where the folder has been transferred. All staff need to be aware that the tracking and retrieval of information is fully reliant on staff using an appropriate system to record all folder movements. Folder movements must also be manually recorded on the front of the cover by the person finishing with the folder.
- (f) When not being used, physical folders should be stored in either of the following locations:
 - (i) relevant business area primary records storage repository;
 - (ii) central records storage repository; or
 - (iii) approved off-site records storage repository.
- (g) Physical folders should only be stored in primary or central record storage repositories while access and use is required on a regular basis, e.g. daily, weekly or monthly. Physical folders that have not been actioned or accessed for over twelve (12) months should be considered for transfer to a secondary storage repository.
- (h) Physical folders must not be removed from PSNI premises, unless as part of the conduct of PSNI business. Physical records will not be stored in the homes of police officers or civilian staff. As with other types of records, physical records constitute a corporate resource and need to be managed in line with corporate policy.

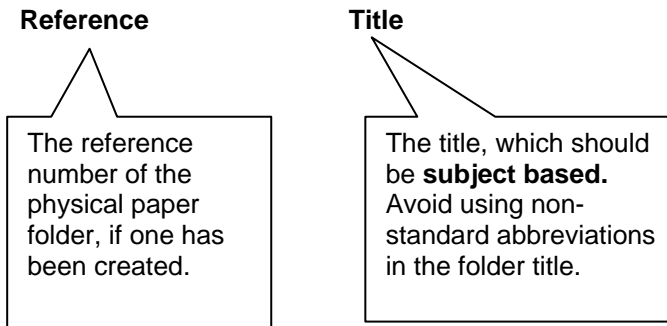
4. TITLING CONVENTIONS

- (1) The title given to electronic and physical documents, records and folders should follow naming convention guidance in order to ensure consistency in the structure and words used to describe their content. The employment of naming conventions enables related information to be brought together under a common label and clearly distinguishes between different types of information.

NOT PROTECTIVELY MARKED

- (2) The content or subject should be clearly reflected in the title assigned to the document, record or folder. It should be specific, informative and meaningful, using only a few keywords to describe the content or subject. Document, record and folder titles should avoid the use of generic terms such as 'general' or 'miscellaneous', as well as the use of non-standard abbreviations and words, that provide little or no context.
- (3) Below are good practice recommendations for the employment of consistent naming conventions for both documents and folders. These should be used by all staff when creating new folders or documents.
- (4) Folder Titling Conventions

- (a) Folder titles should consist of the following elements:



- (b) Examples of appropriate folder naming conventions include:

- (i) TU04_0001_04 – Lisburn District Policing Partnership;
- (ii) 2004-3094-112 – Donegall Pass Minor Works;
- (iii) Spending Review 2004-2005;
- (iv) Devolution of Law and Order; and
- (vii) Health & Safety Policy.

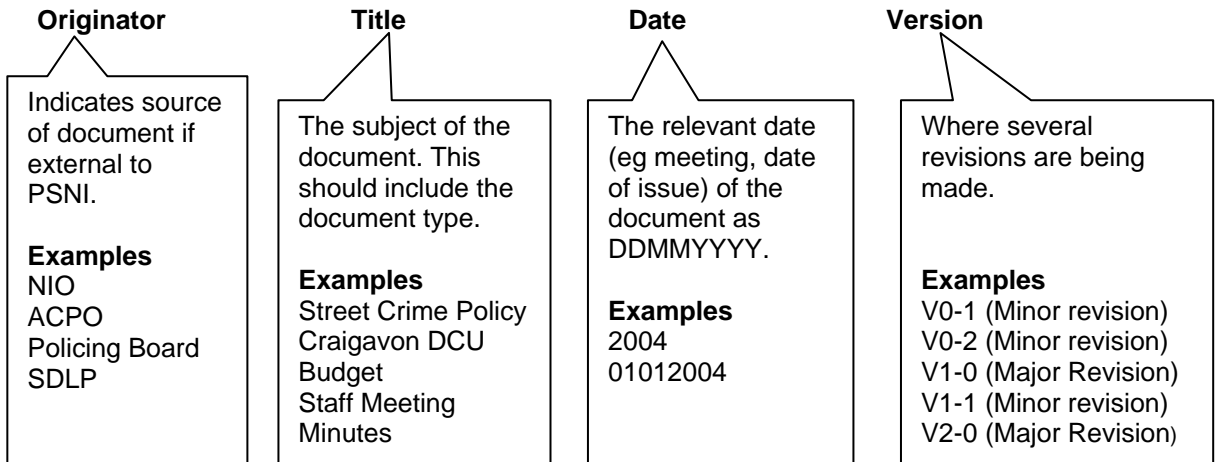
- (c) Examples of inappropriate folder naming conventions include:

- (i) 2004;
- (ii) Miscellaneous;
- (iii) Corp Devel Strat Plan;
- (iv) Drafting; and
- (v) James' Documents

- (d) These titles provide no indication of the subject matter or content of the folders. It is important to remember that the folder title must not only be meaningful to the folder creator but must also have meaning for other members of staff within PSNI.

(5) Document/Record Titling Conventions

(a) Documents and records where appropriate should employ the following elements:



(b) Examples of appropriate document naming conventions include:

- (i) ACPO – Road Traffic Manual - V1-0;
- (ii) HMIC – Statement of Findings & Recommendations – 2004;
- (iii) Training and Development Policy – V0-2;
- (iv) Annual Resource Accounts – 2003-2004; and
- (v) A Smith MP – Purchase of Water Cannons – 20040312.

(c) Examples of inappropriate document naming conventions include:

- (i) Letter from A Smith (Political Party) about the Policing of Parades in North Belfast;
- (ii) Budget Spreadsheet;
- (iii) Free of Info Pol Doc Ver1.0 12-03-2004;
- (iv) PQ Response; and
- (v) 1/03/04 Meeting Minutes.

(6) It should be remembered that not all document titles will incorporate the elements detailed above. For example, minutes of a meeting do not need to include a version number as it is likely that only a single version will be circulated. Similarly, a Policy Document does not need to include the date the document was created, as this will be automatically captured by the software application. All documents however must include a subject based title. The other elements should only be used where they will provide context to the document content.

(7) If titles are inaccurate, ambiguous or imprecise then retrieval of information will become difficult, staff time will be wasted and eventually staff will lose confidence in the system. The establishment of simple rules to define and title documents, records and folders is designed to encourage consistent practice and reduce the possibility of information being lost or misplaced due to inadequate naming conventions.

5. MANAGING SECURITY AND ACCESS

- (1) The PSNI's Manual of Protective Security clearly outlines procedures for the protection of information and other vital assets from threat whether internal or external, deliberate or accidental. The Manual covers, amongst other things, IT Security, Personnel, Secure Transmission Equipment, Risk Management and Business Continuity.
- (2) Chapter 3 of the Manual clearly establishes the procedures and processes to be followed in the marking, access, storage and mailing of information. All staff are responsible for ensuring that they comply with the protective marking scheme and take the necessary measures to ensure that all records are adequately protected.
- (3) All staff should note that failure to adequately protect information, irrespective of whether it has been assigned a classification, may possibly result in the imposition of disciplinary or criminal sanctions. For further guidance on protective markings and the responsibility of PSNI employee's reference should be made to the Manual of Protective Security available on PoliceNet..

6. MANAGING RECORD REVIEW, RETENTION AND DISPOSAL

Information is stored and maintained because it has value not only to the PSNI but also to government and the public. Information that has no ongoing business value, is out of date or inaccurate should not be retained. Unless the information is of historical significance and therefore needs to be retained permanently, it should be disposed of in compliance with the PSNI Review, Retention and Disposal Schedule.

(1) Review, Retention and Disposal Schedule

- (a) The disposition of a record is assigned at the point of creation or declaration and is determined by the PSNI Review, Retention and Disposal Schedule . As a consequence there is a need to identify categories of records and predict their value to the organisation. This involves categorising records into the following three categories:
 - (i) **records to be destroyed after a defined period** – this refers to information whose useful life can be predetermined, and can therefore be destroyed or deleted once it has met its specified time period. For example, financial information, which can usually be destroyed seven years after the last action;
 - (ii) **records to be reviewed** – this refers to information which requires a later judgement to confirm or change the initial retention period applied. For example, information relating to policy decisions; and
 - (iii) **records to be permanently preserved** – this refers to information that has social or historical value. This includes records selected for transfer to the Public Records Office of Northern Ireland as well as information that has long term value to the PSNI but will not require eventual transfer to PRONI. For example, information relating to the investigation of a high profile murder case.
- (b) To properly co-ordinate and facilitate the management of information, all records within the PSNI are controlled by the use and application of the PSNI Review, Retention and Disposal Schedule, approved by PRONI. The objective of this schedule is to:
 - (i) identify records worth preserving permanently;
 - (ii) prevent the premature destruction of records that need to be retained for a specific period in order to satisfy business and legal requirements;
 - (iii) authorise the destruction of temporary records after a specified period;
 - (iv) minimise the costs of long term records storage; and
 - (v) promote improved records management practices.

- (c) The PSNI Review, Retention and Disposal Schedule will be applied to electronic and physical folders. Staff should avoid placing records with varying retention periods in the same folder. Where a folder does contain a variety of records with various retention periods, the folder should adopt the action that specifies the longest retention period. Documents should not be weeded from folders but should be retained for as long as the retention period specifies, in order to ensure that an accurate audit trail of actions and decisions is maintained.
- (d) The Review, Retention and Disposal Schedule (see Appendix 'A') will be reviewed annually to ensure that the information it contains is accurate and up to date. Over time, record categories will change in nature or acquire or lose significance, some categories may disappear and new categories may appear. It may also be necessary to reduce or expand some retention periods.
- (e) Annually the Records Manager or Deputy Records Manager will ask Records Reviewers within each district/department to review retention periods and identify amendments or to confirm their accuracy. Additionally, Records Auditors will identify any changes to the retention period, which require amendment or inclusion as part of their annual review process. Any amendments to the PSNI Review, Retention and Disposal Schedule will be communicated to all holders of the Records Management Policy. Amendments to the PSNI Review Retention and Disposal Schedule must be communicated to the Records Manager or Deputy Records Manager immediately – **do not wait for the annual review exercise.**
- (f) It should be noted that if any document falls within the contents of a prosecution file the requirements of The Criminal Procedures and Investigations Act 1996 will be complied with.

(2) Closing Folders

- (a) Retention periods will be enacted as a result of a folder being closed. Folders should be closed when:
 - (i) it is five years old. That is if five years have elapsed since the date it was opened, as indicated on the front of the folder cover or the folder properties if it is retained in electronic format; (there will be some exceptions to this eg personnel staff files etc.);
 - (ii) it reaches 3 cm thick. At this point a new folder should be opened and cross-referenced to any previous folder; or
 - (iii) if nothing new has been added for two years.
- (b) Closing a folder does not mean it can no longer be used. It simply means that any future documents on the subject will be filed in a new one. When closing a physical folder the dates of the earliest and latest papers and the date of 'First Review' must be clearly shown on the folder cover. It is also helpful to stamp or write the word 'Closed' on the outside of the folder.

(3) Destroying Records

- (a) At each years-end, the Records Reviewer will identify records due for destruction in compliance with the PSNI Review, Retention and Disposal Schedule. This will either be triggered by the last action on a folder or the date the folder was closed. Records Auditors should be consulted for advice and guidance.
- (b) Records due for review, retention or destruction will be listed on Form RM3 - specimen attached at Appendix 'B' and circulated by the Records Reviewer to managers within each district/department to ensure the records have no ongoing business value. Before destruction of the records can proceed, Form RM3 will require the signature of the ACC/District Commander or Head of Department and the Records Manager or Deputy Records Manager. In order to provide a complete audit trail, the Records Management Unit will be responsible for retaining all original RM3 Forms.

- (c) Records due for destruction under the authority of PRONI will be listed on Form RM4 – specimen attached at Appendix ‘B’. Before destruction of the records can proceed, the Form RM4 will require the signature of the ACC/District Commander or Head of Department, Representative from PRONI and the Records Manager or Deputy Records Manager. In order to provide a complete audit trail, the Records Management Unit will be responsible for retaining all original RM4 Forms.
- (d) Where Legal Services receive notification of an impending legal action they shall notify the Records Management Unit immediately.
- (e) Records which form the subject of an enquiry or impending legal action and/or, are relevant to a Data Protection or Freedom of Information access request must not be destroyed even though they have met their defined retention period. These records will be placed under an embargo and will not be destroyed until such time that authorisation is granted by Legal Services (Form RM1 should be completed). Following consultation with Legal Services the Head of Corporate Development shall issue a direction to suspend any further destruction action relating to the pertinent information.
- (f) In order to ensure organisational accountability, it is essential that all records are destroyed in compliance with the PSNI Review, Retention and Disposal Schedule. Information should not be deleted or documents weeded from folders until they have reached their disposal period. Where a folder has met its retention period the entire folder must be destroyed, earlier papers must not be removed.
- (g) Records due for destruction should be shredded and arrangements made for recycling. This method of destruction ensures compliance with government policy on green issues.
- (h) Declaring a document to be a **record** is a formal point of transition at which it passes into corporate ownership. Once designated as a **record**, the item is no longer managed by the creator but by the Service as part of its corporate information resources. The creator should then **delete** all copies of the **document** apart from the final version. The **record** will **not** thereafter be altered, and will be retained in compliance with the PSNI Review, Retention and Disposal Schedule.

(4) Reviewing Records

- (a) At each years-end, Records Reviewers will be responsible for identifying records which require review. Records Auditors should be consulted for advice and guidance. The purpose of the review will be to establish whether information is worthy of further retention or whether it could be destroyed within a defined disposal period. The focus of the review process will be on the administrative value of the records rather than their historical or social value.
- (b) Records Reviewers will employ the following criteria in assessing whether records should be retained:
 - (i) is there a continuing need to retain this record for the conduct of day-to-day business?
 - (ii) how real is the need for constant reference to this record in the future?
 - (iii) will it be needed to deal with enquiries in the future? How many enquiries are likely?
 - (iv) is the information needed for statistical analysis within the organisation? Are there bodies of statistical information upon which future policies and forecasts may be based?
 - (v) is the information required for conducting legal proceedings in the event of a legal action being taken by, or against, the PSNI?
 - (vi) is there a legal requirement to retain these records?
 - (vii) is there a financial need to retain these records (for example, for audit purposes)?

(viii) is the information significant because it provides precedents or is required for authorisation purposes?

(c) Information subject to review will undergo a two tier process:

FIRST REVIEW - FORM RM1 - specimen attached at Appendix 'B'

- (i) The first review takes place 5 years from the date the last paper was added. The Records Reviewer in conjunction with their district commander or head of department will be responsible for reviewing records, determining retention and outlining the reasons why records should be retained. Records Auditors should be consulted if required for advice and guidance. This decision should be based purely on administrative need. PRONI will be responsible for examining those records marked for destruction during the first review period in order to determine whether they have any historical or research value.
- (ii) A First Review Form should be completed for each folder reviewed and placed on the inside of the folder cover. Additionally Form RM3 - Record Review Summary - specimen attached at Appendix 'B' should be completed. This form will provide an outline of all folders which have been reviewed and the reasons why they have been retained or destroyed. This form will be retained by the Records Management Unit.
- (iii) The PSNI is responsible for destroying those folders which neither PRONI nor the PSNI consider worthy of retention. All records recommended for further retention by the Records Reviewer should be retained until they are due for Second Review or until the period of retention has elapsed.
- (iv) Those folders which, at First Review, have been rejected but which PRONI wishes to retain, will be listed on a transfer receipt form for the PSNI and will then be transferred into Internal Limbo Storage at PRONI. These will be held until Second Review when their fate will be decided by PRONI without reference to the PSNI.

(d) SECOND REVIEW - FORM RM2 - specimen attached at Appendix 'B'

- (i) The Second Review takes place 20 years after the folder has been closed or 15 years after the First Review. Records Reviewers will be responsible for undertaking an initial review of the records. Records Auditors should be consulted if required. Decisions on the retention of the record(s) should be based on the ongoing administrative value of the record or the need to retain the record permanently within PSNI. PRONI will be responsible for reviewing the remaining records and determining those to be selected for transfer to and permanent preservation in PRONI storage facilities.
- (ii) A Second Review Form should be completed for each folder reviewed and placed on the inside of the folder cover. Additionally Form RM3 - Record Review Summary should be completed. This form will provide an outline of all folders which have been reviewed and the reasons why they have been retained or destroyed. This form will be retained by the Records Management Unit.
- (iii) Records marked for permanent preservation should be transferred to PRONI. If, at Second Review stage, the PSNI wishes to retain any records for a further term of years, it is the responsibility of the PSNI to retain any such records and to dispose of them when the period of retention has lapsed.

(5) Transferring Permanent Records

- (i) Records selected for permanent preservation should be transferred to PRONI 20 years after the date of closure or the last action, unless otherwise stated in the retention schedule. This usually occurs after the Second Review stage. Where records have been identified for permanent preservation, the Records Manager or Deputy Records Manager should notify the Acquisitions Section of PRONI to arrange a visit so that a review of the records can be carried out.

- (ii) Once PRONI has finalised the list of records it wishes to retain permanently they will arrange for the delivery of special storage boxes into which the folders should be packed. The Records Manager or Deputy Records Manager will be responsible for arranging a suitable time for collection of the records, in consultation with the relevant district/department.
- (iii) A list should be made of folders packed in each individual box. The Records Manager or Deputy Records Manager should retain a copy of the list in order to facilitate future recall of records. Copies of the list should also be placed with each box.
- (iv) Records transferred to PRONI remain the property of the PSNI and may be recalled at any time. Files held by PRONI will generally remain closed to the public for a period of 30 years, unless they are the subject of a Freedom of Information or Data Protection request. In order to determine if release is appropriate at this time a sensitivity review will be carried out by the PSNI.

7. RECORDS MANAGEMENT AUDIT

- (1) Audits will be conducted on a regular basis to ensure that all aspects of folder and record creation and management are being adhered to. Responsibility for conducting the audit should rest with the Records Manager/Deputy Records Manager and Records Auditors.
- (2) The audit will monitor the following actions:
 - (a) **File plan maintenance:** Ensuring that the classification structure remains static and consistent within the first three to four levels;
 - (b) **Document creation :** Ensuring that documents meet corporate publishing standards;
 - (c) **Record creation:** Ensuring that documents that have reached the final version stage have been formally identified as records;
 - (d) **Record registration:** Ensuring that all records are placed into an appropriate folder and that the folder is managed within the File Plan structure;
 - (e) **Version control:** Ensuring that new document versions are clearly identified and that the integrity of the original has been maintained;
 - (f) **Security:** Ensuring that records have been assigned the correct security classification;
 - (e) **Folder and document titling:** Ensuring that documents and folders are named in accordance with standard titling conventions; and
 - (h) **Record review/retention/disposal:** Ensuring the regular review, retention and destruction of records in compliance with the PSNI Review, Retention and Disposal Schedule.
- (3) The monitoring of record management practices will be undertaken on a regular basis. This will not only ensure the authenticity of the record but also enables the Records Manager or Deputy Records Manager to ascertain whether districts/departments are managing and maintaining corporate and administrative information in line with organisational procedures.
- (4) Once the audit is complete a report will be produced detailing the actions audited, the date and by whom the audit was carried out. The report should highlight any deviation from standard procedures in the creation and management of folders and records, and whether this is due to a lack of proper training or understanding, or is an isolated occurrence.

8. INTERNAL LINKS

- (1) This Policy links to the following policy documents within PSNI:
 - (a) Acceptable Use Policy;

- (b) Manual of Protective Security; and
 - (c) Freedom of Information Policy.
- (2) This Policy should be read in conjunction with the following Service Procedures: |
- (a) Service Procedure No 50/00 - Data Protection Act 1998; |
 - (b) Service Procedure No 12/01 - Request for Disclosure of Personal Data; |
 - (c) Service Procedure No 55/02 - The National Published Archive - Legal Deposit of Official Publications; |
 - (d) Service Procedure No 61/02 - Sharing of Personal Data Policy and the Data Protection Act 1998. |

PSNI REVIEW, RETENTION AND DISPOSAL SCHEDULE

The PSNI Review, Retention and Disposal Schedule will be published later



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NOT PROTECTIVELY MARKED
Records Management Policy

FIRST REVIEW FORM

Reviewing Officer _____ (Print)

File Reference _____

File Title _____

File Location _____

I have **examined** and **reviewed** the attached file and, with regard to disposal, recommend as follows:

('X' as appropriate)

Retain until Second Review (15 years after 1st review)

Retain for a further _____ year(s)
(if you wish to review prior to 2nd Review)

Permanent - Retention by PSNI

Permanent - Transfer to PRONI

Embargo - Give reason

If retained, please state the reason and why the period is appropriate:

Signature _____ Review Date _____

Service/Payroll Number _____

A copy of this form should be attached to RM3 for forwarding to Records Management Unit, via email (Global Address List - zRecordsManagement) or Fax to Extension 33677.



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NOT PROTECTIVELY MARKED

Records Management Policy

SECOND REVIEW FORM

Reviewing Officer _____ (Print)

File Reference _____

File Title _____

File Location _____

I have **examined** and **reviewed** the attached file and, with regard to disposal, recommend as follows:

(‘X’ as appropriate)

Permanent - Retention by PSNI

Permanent - Transfer to PRONI

Embargo - Give reason

If retained, please state the reason and why the period is appropriate:

Signature _____ Review Date _____

Service/Payroll Number _____

A copy of this form should be attached to RM3 for forwarding to Records Management Unit, via email (Global Address List - zRecordsManagement) or Fax to Extension 33677.



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RECORD REVIEW SUMMARY

Location		(Print)		Record Reviewer		(Print)		
Year	File Title	Series Title/Category Type	Passed to (Reviewing Officer's Name)	Date of 1st Paper	Date of Last Paper	Schedule Ref	Action Key	Storage Location

District Commander/Head of Department _____ (Print)

Signature _____

Service/Payroll Number _____

Review Date _____

ACTION KEY

- R - Retain until 2nd Review
- R1 yr - Review prior to 2nd Review, give year
- DS - Destroy under Schedule
- DN* - Destroy under Normal Review Process
- PR - Permanent - Retention by PSNI
- PT - Permanent - Transfer to PRONI
- E - Embargoed

DN* - File details should be listed on Form RM4

RM3 PB 7/09 This form should be sent to Records Management Unit via email to zRecordsManagement or Fax to Extension 33677, for approval.

NOT PROTECTIVELY MARKED



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NORMAL REVIEW PROCESS - DESTRUCTION AUTHORITY

REVIEW DATE					
YEAR	SERIES TITLE/CATEGORY TYPE				
FILE REF	FILE TITLE	DATE OF 1st PAPER	DATE OF LAST PAPER	Schedule Ref	

District/Departmental Record Reviewer's Name _____ (Print)

Location _____

Signature _____ Staff Reference Number _____

I hereby authorise the destruction of the records above.

District Commander/Head of Department _____

Signature _____ Print _____

Staff Reference _____ Date of Decision _____

PRONI Representative's Signature _____ Print _____

Staff Reference _____ Date of Decision _____

Record Manager's Signature _____ Print _____

Staff Reference _____ Date of Decision _____

This form should be signed and posted to Records Management Unit