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## SI0419

# Records Management

The purpose of this service instruction is to deliver a consistent approach to Records Management across the Police Service of Northern Ireland, 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.

It 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](#). (The 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. PSNI Commitment

The PSNI is committed to implementing all appropriate measures, procedural, physical and digital, which are designed for the effective management of records. These methods are consistent with organisational needs, accountability and legislative requirements and are integrated and embedded as key activities throughout the organisation:

<b>Ownership</b>	<ul style="list-style-type: none"> <li>All records created during the course of day-to-day business are owned by the PSNI and <b>not</b> the individual who created them.</li> </ul>
<b>Managing</b>	<ul style="list-style-type: none"> <li>All records and the associated related components of the record through the record life cycle.</li> </ul>
<b>Ensuring</b>	<ul style="list-style-type: none"> <li>Its record keeping is carried out in a manner which accurately documents the functions of the PSNI and is compliant with associated policy;</li> <li>Procedures, guidance and training are available to assist staff in producing records which reliably represent accurate information that is used in, or</li> </ul>

	<p>created by, the business process and which will enable reliability integrity and authenticity to be demonstrated;</p> <ul style="list-style-type: none"> <li>• Activities relating to records management from creation to appraisal are adequately resourced; and</li> <li>• 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.</li> </ul>
<b>Adopting</b>	<ul style="list-style-type: none"> <li>• The record management principles of 'records management by design and by default' in the consideration of all process and technology designs, and implementations;</li> <li>• The principal of record ownership based on function including historic records i.e. 'If you own the function you own the record'; and</li> <li>• One corporate electronic document and record management solution across the PSNI for the management of all unstructured documents, emails etc.</li> </ul>
<b>Implementing</b>	<ul style="list-style-type: none"> <li>• Appropriate security for the storage, management and transportation of PSNI information;</li> <li>• Adequate and appropriate infrastructure in terms of estate or digital environments (digital continuity) to ensure the retention of records as required by the PSNI review retention and disposal schedule; and</li> <li>• Appropriate and secure procedures and processes for sharing of information</li> </ul>
<b>Appointing</b>	<ul style="list-style-type: none"> <li>• Operational Business Owners/Information Asset Owners to each business area/system to ensure that PSNI information assets are accessed, controlled and managed accordingly;</li> </ul>

## 4. Role of 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:

<b>Know</b>	<ul style="list-style-type: none"> <li>• What records it has; and</li> <li>• Where those records are.</li> </ul>	<b>Understand</b>	<ul style="list-style-type: none"> <li>• The security around the records; and</li> <li>• How long the records are required to be retained.</li> </ul>
<b>Effectively</b>	<ul style="list-style-type: none"> <li>• Manage the whole record through the life cycle.</li> </ul>	<b>Access</b>	<ul style="list-style-type: none"> <li>• Records when required, providing timely information for operational need.</li> </ul>
<b>Provide</b>	<ul style="list-style-type: none"> <li>• Secure and legally admissible records demonstrating accountability.</li> </ul>	<b>Ensure</b>	<ul style="list-style-type: none"> <li>• Records, particularly those containing personal or sensitive information, are not retained for longer than is legislatively, legally or administratively necessary.</li> </ul>
<b>Store</b>	<ul style="list-style-type: none"> <li>• And retain historical records of past activity to provide a corporate memory.</li> </ul>	<b>Make</b>	<ul style="list-style-type: none"> <li>• Best use of space and storage facilities both physically and electronically.</li> </ul>
<b>Optimise</b>	<ul style="list-style-type: none"> <li>• Use of staff time.</li> </ul>	<b>Improve</b>	<ul style="list-style-type: none"> <li>• Control over records.</li> </ul>
<b>Comply</b>	<ul style="list-style-type: none"> <li>• With legislation and PSNI policy.</li> </ul>	<b>Reduce</b>	<ul style="list-style-type: none"> <li>• Costs.</li> </ul>
<b>Maintain</b>	<ul style="list-style-type: none"> <li>• Reputation and public confidence in policing.</li> </ul>		

## 5. Responsibilities

<p><b>All staff</b></p>	<ul style="list-style-type: none"> <li>• Ensuring they have a clear understanding of records management and demonstrate commitment to duties relating to record keeping;</li> <li>• Creating records which are consistent, reliable, accurate and complete;</li> <li>• Identifying records which should be captured because of their business function or content;</li> <li>• Prior to leaving the PSNI , officers/staff must;             <ul style="list-style-type: none"> <li>○ Transfer all digital records from personal file shares to corporate storage.</li> <li>○ Return all notebooks journals and daybooks in accordance with the relevant Service Instruction.</li> <li>○ Return all hard copy records they hold to their supervisor.</li> </ul> </li> <li>• Recognising e-mails which are corporate records and filing accordingly;</li> <li>• Capturing records which authentically document business activities;</li> <li>• Storing records in the appropriate area digitally and/or in physical storage;</li> <li>• Applying security and access controls to records, where appropriate;</li> <li>• Ensuring that searching, viewing and browsing records is done only for PSNI business purposes;</li> <li>• Finalising documents when appropriate to ensure they become PSNI records; and</li> <li>• Applying appropriate disposal and retention actions to records based on the PSNI Retention and Disposal Schedule.</li> </ul>
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<p><b>Records Manager</b></p>	<ul style="list-style-type: none"> <li>The Records Manager will publish records management policies and procedures and co-ordinate the compliance, monitoring of those policies and procedures and provision of guidance on the principles of retention.</li> </ul>
<p><b>Record Officers</b></p>	<ul style="list-style-type: none"> <li>The purpose of this role is, while centrally managed, to work in a devolved environment, as the local records management representative, with Operational Business Owners/Information Asset owners and record reviewers to provide the required records management advice and guidance required to enable local teams to manage their records from creation, use, maintenance, storage and eventual disposition in both the physical and electronic environments.</li> </ul>
<p><b>Operational Business Owners Information Asset Owners</b></p>	<ul style="list-style-type: none"> <li>Operational Business Owners (OBOs) /Information Asset Owners (IAOs) are senior members of staff involved in running the relevant business and/or system. Their role is to understand what information is held, what is added and what is removed, 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.</li> </ul>
<p><b>Senior Information Risk Officer</b></p>	<ul style="list-style-type: none"> <li>The Senior Information Risk Officer (SIRO) has overall responsibility for the organisational function of records management.</li> </ul>

## 6. Statutory Legislation and Guidance

There are a number of pieces of legislation which 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:

- Public Records Act (NI) 1923;
- Disposal of Records Order 1925;
- Criminal Procedure and Investigations Act 1996;
- General Data Protection Regulations 2018;
- Data Protection Act 2018;
- Lord Chancellor’s Code of Practice on the Management of Records under Section 46 of the FOI Act 2000  
Environmental Information Regulations 2004; and
- Human Rights Act 1998.

Also where appropriate, comply with guidance issued by the:

- Public Records Office Northern Ireland;
- National Archives;
- College of Policing;
- National Police Chiefs Council;
- Information Commissioner; and
- Northern Ireland Civil Service.

This instruction is in line with the draft national records management strategy and will be updated as the strategy is published and all future revisions.

## 7. Access and Security

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

**“The Service Executive Team has recognised that data misuse is a serious issue which contravenes the law and potentially undermines public confidence and has issued new guidance in order to eliminate any doubt about appropriate conduct. In future, any instance where an individual looks at a confidential information system for a personal purpose and/or without a policing purpose, it may not only constitute a breach of the Data Protection Act, but will also be viewed as a breach of the Code of Ethics and therefore likely to result, if proven, in dismissal. For clarity, police information systems must only be searched where there is a genuine policing purpose and where the check is necessary as part of your role. Each of us needs to ensure that our integrity remains intact and not open to question or mistrust. We may need to justify our use of confidential systems, so we need to be aware of the guidelines and seek advice where necessary, when considering accessing any of this information.”**

**(DCC Stephen Martin)**

Staff are personally responsible for the safe-keeping of personal data in their possession and should ensure this is only accessed and processed in line with business need:

- They must not search for or view information which is not appropriate to them or their business area; and
- Viewing or carrying out excessive searches for information (personal or otherwise) will be challenged and any abuse/wrongdoing found may result in them facing disciplinary action.

Compliance checks will be carried out to ensure sensitive and/or personal information is appropriately restricted.

Where access controls have not been appropriately applied to sensitive/personal Information, staff may be challenged.

Audit logs will also be used to identify inappropriate viewing, previewing and/or editing of such information.

## **8. Review Retention and 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.

Retention and 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 and 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 should 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 of In the case of the request for information and 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 information to be consistent and compliant;
- They can be confident information is disposed of at the appropriate time; and
- Information is 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 and 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 Electronic Document and Record Management System (EDRMS) currently TRIM, to ensure a complete and accurate representation of the record.

## Appendix A Contact Us

Any queries about records management legislation in the PSNI should be addressed to the Records Management Unit

### **Service Instruction Author**

Records Manager C054362

### **Branch Email**

[zRecordsManagement@psni.pnn.police.uk](mailto:zRecordsManagement@psni.pnn.police.uk)