

# Records and Information Management Policy

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## DOCUMENT CONTROL

The Information and Compliance Manager is the owner of this document and is responsible for ensuring it's distribution. The document will be reviewed and updated as needed.

## DOCUMENT INFORMATION

<b>Title</b>	Records and Information Management Policy	<b>Version</b>	2.0
<b>Author</b>	Information & Compliance Manager	<b>Date</b>	11/08/2018
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<b>CM Reference</b>	SIBI/25/420	<b>Next Review</b>	14/02/2026

## CHANGE HISTORY

<b>Ver. No.</b>	<b>Ver. Date</b>	<b>Description</b>	<b>Reviewer</b>	<b>Status</b>
1.0	08/11/2007	First version finalised	Information & Compliance Manager	Final
2.0	31/03/2012	Policy reviewed, updated and reissued. [Previous version is at DF1/07/185351]	Information & Compliance Manager	Final
3.0	20/02/2013	Policy reviewed and updated as a new revision.  Changes made in regard to corporate and information governance procedures – see DF1/13/82970 “Letter from Noel Lavery to Brett Hannam re Corporate and Information Governance procedures - 22 January 2013”.  References checked and updated as necessary.  Reviewed against the latest “DoF Records Management Staff Handbook” (draft).	Information & Compliance Manager	Final
3.1	08/07/2013	Review and update  Changes to cover records in social media and private emails in light of ICO guidance issued – see particularly Section 12 “Official Information on or in Non-official Systems” <b>Error! Bookmark not defined..</b>	Information & Compliance Manager	Final

3.2	02/03/2015	Review and update as needed. Mostly minor updates and changes to wording to reflect changes in technology.	Information & Compliance Manager	Final
3.5	28/06/2016	Review and update as needed. Changes to reflect TRIM being renamed as HP Records Manager. Changes to accommodate the different employment models used by SIB Added Appendix 1 "Staff Using Their Own Equipment".	Information & Compliance Manager	Final
3.6	01/08/2018	Review and update as needed. Changes made to reflect GDPR and DPA 2018.	Information & Compliance Manager	Final
4.0	14/02/2025	Review – substantive rewrite in line with the NICS Records Management Policy	Records Manager / Information & Compliance Manager	Final

## DISTRIBUTION

Group	Date
All staff via Intranet/App	14/02/2025

# 1 Introduction and Purpose

This Records Management Policy details the commitment of the Strategic Investment Board (SIB) to achieving the highest possible standards in records management.

SIB handles a large amount of information. This information relates to specific topics and policies as well as records of decisions, action taken and the rationale behind these decisions made by SIB staff. SIB appreciates that its records are a vital public asset and are required to ensure the effective operation, openness and accountability of the organisation. Like any asset, records require careful management and this policy sets out SIB's responsibilities and activities in respect of this.

Effective records management goes a long way to ensuring that we have the right information at the right time to make the best-informed decisions we can. It also provides evidence of what we do and why, therefore protecting the interests of the SIB, our staff and all who interact with SIB. We aim to balance our commitment to openness and transparency with our responsibility as an effective information controller and processor.

We continually create records and will work to ensure that we manage them efficiently, make them accessible to all where possible, and retain them securely throughout their lifecycle.

By adopting this policy, SIB aims to make sure that the record, whatever form it takes, is accurate, reliable, ordered, complete, useful, and accessible whenever it is needed.

## 2 Scope and Objectives

This policy applies to the management of all documents and records, in all formats or media, created or received by SIB in the conduct of their business activities. It also applies to all staff, contractors, consultants and third parties who may be given access to our documents and records and information processing facilities. A systematic approach to the management of the records we hold is essential to protect and preserve the evidence of our actions and decision-making. A small percentage of the records held by SIB will be selected for permanent preservation by the Public Record Office of Northern Ireland (PRONI) to form part of Northern Ireland's archival heritage.

In order to achieve this systematic approach SIB will:

- Create and capture accurate, authentic and reliable records;
- Maintain records to meet SIB's business needs;
- Operate a "digital first" policy, maintaining only one corporate copy of a record in one location;
- Dispose of records that are no longer required in an appropriate manner;
- Protect vital records;
- Conform to any legal and statutory requirements relating to record keeping;
- Comply with rules on best evidence in law courts; and
- Comply with government directives.

## 3 Regulatory Environment

SIB is a data controller with obligations set out in the Data Protection Act 2018 and a public authority with obligations under the Freedom of Information Act 2000.

The legal and regulatory framework for records management is outlined below and includes:

The legislation regulated by ICO:

- The Data Protection Act 2018
- The Freedom of Information Act 2000
- Regulation (EU) 2016/679 (General Data Protection Regulation)
- Privacy and Electronic Communications Regulations 2003
- The Environmental Information Regulations 2004

Other related legislation:

- The Public Records Act (NI) 1923
- The Re-use of Public Sector Information Regulations 2005
- Disposal of Documents Orders 1925
- Inquiries Act 2005
- The Inquiries Rules 2006

Related guidance and codes of good practice:

- Section 46 Freedom of Information Act – Records Management
- BS ISO15489 – Records Management
- The ICO's published guidance and codes of practice

## 4 Responsibilities

SIB has a shared responsibility to maintain its records and record keeping systems in accordance with the regulatory environment as described above. In order to achieve this, certain members of staff have specific roles in relation to records management. The Chief Executive Officer with overall responsibility for this policy is the Senior Information Risk Owner (SIRO). Each business area head should have their own policy guidance and procedures that also incorporate good records management practice throughout their area.

SIB also has Information Asset Owners, who have overall responsibility for the management of the records generated by their Business Areas. They are responsible for making sure that a complete record of the business undertaken by their area is captured, and that records management systems (electronic or otherwise) and procedures are used appropriately. They are assisted in this by the Information and Compliance Team who play a key role in providing a dedicated, well-trained source of expertise on information management. They act as a conduit to ensure legislative requirements and policy are communicated to senior management and staff and implemented within business areas.

All employees of SIB (permanent and temporary), contractors, consultants and secondees must ensure that the records for which they are personally responsible are complete and accurate. They must also ensure that records are maintained and disposed of in accordance with SIB's records management policies and procedures.

All employees working with other organisations should ensure they are familiar with their local policies and procedures and comply with them.

## 5 Corporate Records Keeping Systems

### 5.1 PAPER RECORDS

SIB initially maintained a paper-based records system. Certain documents are retained off-site and will be included in file reviews and compliance with the Retention and Disposal Schedule.

SIB now operates a 'paperless' office and all records should be stored electronically in the appropriate system.

## **5.2 ELECTRONIC DOCUMENT AND RECORDS MANAGEMENT (EDRM) SYSTEM**

SIB joined the NICS EDRM system in 2007, now known as Content Manager. Since then, it has been the corporate repository for the majority of information created and received by SIB in the course of their duties: this includes emails that must be retained for business purposes as evidence of a decision or transaction carried out by or on behalf of SIB.

## **5.3 SHARED DRIVES**

Unfortunately, It is not technically feasible to store linked spreadsheets and databases in the EDRMS used by SIB. These are stored on shared drives, which are carefully monitored to ensure that only nominated file types are kept in this way.

## **5.4 LINE OF BUSINESS SYSTEMS**

SIB uses and maintains line of business systems for specific business requirements. These systems generate and hold data that must also be considered and managed in line with records management policies and guidance. Currently, the main system are for financial information, human resources and strategic support information management.

## **5.5 OTHER COLLABORATIVE SYSTEMS**

Whilst other systems capable of generating records are utilised by SIB, such as Microsoft Office 365, it should be noted that these systems are currently not configured for use in record keeping and as such any records that are to be retained must be extracted and stored in the official EDRMS.

# **6 Retention and Disposal**

Information and records must be held no longer than required to support SIB's business needs and legal obligations. SIB has a detailed Retention and Disposal Schedule, which list record classifications and their retention periods. At the end of that time the records will be appraised by PRONI for permanent preservation. Those records that are selected by PRONI will be transferred to them. Those that are not will be appropriately disposed of. Full details of the retention and disposal process can be found in the SIB Retention and Disposal Schedule.

# **7 Public Inquiries**

It is possible some SIB records could potentially be required for a Public Inquiry. The Covid Inquiry being one example.

Records created by or provided to a Public Inquiry which has been established by the Northern Ireland Executive are 'public records' as defined by the Public Records Act (NI) 1923.

A Public Inquiry must comply with the provisions set out in the Inquiries Act 2005. Furthermore, The Inquiries Rules 2006/1838 specifically make reference to Records Management (s18) stating that during the course of the inquiry, the chairman must have regard to the need to ensure that the record of the inquiry is comprehensive and well-ordered; and (b) at the end of the inquiry, the chairman must transfer custody of the inquiry record to a department of His Majesty's Government in the United Kingdom or to the appropriate public record office, as the Minister directs.

In this rule, the "appropriate public records office" means the National Archives, the Keeper of the Records of Scotland or the Public Record Office of Northern Ireland.

The Public Record Office of Northern Ireland (PRONI) should be consulted for advice and guidance at an early stage, to ensure good practice in records management is embedded in the Inquiry process.

Policies and procedures must also be in place from the inception of an Inquiry to ensure that all records created by the Inquiry comply with the relevant legal requirements and the FOIA s46 Code as referred to above. The Sponsoring department will advise on the operation of records management procedures and may receive certain records of the Inquiry, as laid out in the Retention and Disposal Schedule of the Inquiry. The Sponsoring department should also ensure that any short-term body that it sponsors (such as an inquiry) maintains a record of its activity and meets its responsibilities in accordance with the relevant legislation and the Code both before and after any records transfer to PRONI.

Specific and detailed information concerning the management of records and roles and responsibilities is available via the Guidance for Public Inquiries document: [Guidance intended for Public Inquiries](#)

## 8 Monitoring and Compliance

In order to ensure ongoing monitoring of compliance with this policy and supporting standards, the Information and Compliance Team will work with internal auditors and may carry out records management health checks across all business areas.

They will also work with the IAOs annually to conduct a records review and disposal exercise to ensure SIB is in compliance with its Retention and Disposal Schedule.

## 9 Policy Review

This policy will be reviewed annually. Unscheduled reviews will also take place in the event of significant change.