Thame Town Council

Information Management Strategy

1. Introduction

1.1 A record is any information held by the Council and relating to any topic, any individual, any area of work, any decision reached, any action taken and regardless of the medium in which it is held whether paper, electronic, audio tape, video, etc. The Council recognises that:

- records are a corporate resource and a valuable asset
- information has to be looked after properly
- a co-ordinated approach has to be taken to its management

1.2 The legislation now in place on information handling means that there is a need to manage information and to have an effective system for servicing the rights under the UK GDPR and Data Protection Act 2018, the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 and other associated legislation.

1.3 The quality of the Council's records and the efficiency of the systems that provide for their retrieval must be good if the Council is to have a chance of meeting the requirements of the UK GDPR and Data Protection Act 2018 and the Freedom of Information Act. The Council must have in place a tool to be able to comply with the requirements under the Data Protection Act where data requests are dealt with within 1 month and that Freedom of Information requests are dealt with within the statutory 20 working days time limit whilst ensuring that all the requisite data has been included in the disclosure. Inability to find a file will not be considered as an adequate excuse for non-disclosure.

1.4 The Council therefore accepts that it has a responsibility to ensure that all records are:

- created accurately
- stored effectively
- kept securely
- traced efficiently
- retained in their original form if required for the purpose of legal proceedings
- retained only for as long as necessary
- disposed of appropriately

2. Aims

2.1 This strategy provides a basis for the improved management of the Council's records in order to:

- create authentic, reliable and useable records
- support the Council's business functions
- document the Council's decisions and activities
- reduce the volume of records held
- make proper provision for storage

- facilitate the paper office
- enable rapid, efficient, accurate and complete retrieval of information
- comply with access to information requests promptly
- conform with relevant legal and statutory requirements and Codes of Practice
- appropriately dispose of records that are no longer needed
- ensure that staff are suitably trained to deliver services
- ensure that our other assets are efficiently managed
- use technology to assist with the delivery of services to the public

3. Policy Statement

3.1 The Council's policy is to:

- manage its records in a systematic and planned way to prevent or at least to minimise potential risks
- ensure that it can control the quantity and quality of information generated from the time a record is created until its ultimate disposal
- maintain information in a manner that effectively services its needs and those of its stakeholders
- dispose of the information appropriately when it is no longer required
- satisfy the provisions as set out in the UK GDPR and Data Protection Act 2018 and the Freedom of Information Act

3.2 This policy will therefore:

- be made available to staff for reference
- apply to all the Council's records, regardless of how they are held
- be reviewed every year at least and amended and reissued as necessary and members and staff will be notified accordingly
- operate in conjunction with the Town Council's Information and Data Protection Policy and the Document Retention and Disposal Policy

4. Responsibilities

4.1 Each Line Manager will be responsible for all records within their area of work. The Council's lead officer with functional responsibility for information and record management is the Corporate Services Manager.

4.2 Since this strategy obliges all staff to comply with the Council's policy statement, every officer has a responsibility to:

- keep accurate records in an organised and accessible form
- when filing any records, ensure that they comply with the filing protocols of the Town Council
- keep records only for as long as necessary
- ensure that accurate information is available when this is needed
- document their actions and decisions in records
- take documentation of their activities seriously
- understand their responsibilities

4.3 All staff and Councillors and volunteers who handle personal data will receive appropriate training and guidance.

5. Creation and Keeping of Records

5.1 Not all records that the Council holds are created by the Council. Examples include such things as letters and emails received from residents etc. However, when the Town Council creates a record, it must be:

- an accurate and factual account of an event or transaction
- created and captured in a timely manner
- created and captured by an officer with direct knowledge of that event or transaction or
- generated automatically as part of the routine operation of a computer system
- without any unsubstantiated or derogatory remarks and personal opinions
- relevant, complete and accurate enough to facilitate an audit, to protect the rights of the Council and its stakeholders and to prove the authenticity of records
- protected against unauthorised addition, deletion, alteration, use or concealment.

5.2 Comments must be justified from recorded facts and the author must be prepared to defend them.

6. Record Maintenance

6.1 While records are retained, their location and movements need to be tracked to enable quick and easy retrieval, to monitor usage for maintenance of systems and security and to maintain an auditable trail.

6.2 Records that are closed or not currently in use should be stored in a controlled manner in the Town Hall basement rather than stored in the main office. This should be regarded as an extension of the office space from which records can be retrieved as required. All original legal documents must be stored and filed in the fire proof safe.

6.3 The retention and disposal of information and records should be managed in accordance with the Town Council's Document Retention and Disposal Policy as well as the Information and Data Protection Policy. Additionally, the provisions of the UK GDPR and Data Protection Act 2018 will apply and consequently no personal data must be kept longer than is necessary.

7. Accountability

7.1 The council must demonstrate compliance with legislation and be able to demonstrate compliance with data protection principles.