# BBC Corporate Policy

## BBC Records Management Policy

**Effective from: 04/11/2020**

**Policy owner: Nick Watson, Corporate Records Manager**

**Owner's department: BBC Archives**

**Contact details for queries: Archives RecordsManagers@bbc.co.uk**

**Version control: v3**

## ‘One minute’ policy summary

**Purpose & Scope:**
This policy defines the way that BBC records should be managed. It also defines the roles and responsibilities for the creation, safekeeping, access, change and disposal of information.

The BBC relies on good record-keeping to support business processes, to comply with legal requirements and to maintain an archive of its activities.

For the purpose of this policy a record is defined as written evidence of activities performed, events occurred, results achieved, or statements made. Records are created or received by the BBC in routine transaction of its business or in pursuance of its legal obligations.

**Target Audience**:
This policy applies to all BBC employees and third party suppliers contracted to carry out work on behalf of the BBC.

**Impact on risk:**
Freedom of Information Act (FOIA) and Data Protection Act (DPA 2018)

**Key points of this policy:**

1. All records and information created in the course of BBC work are the property of the BBC.
2. All BBC employees are required to manage the records and information that they create according to this policy and deliver records to the archive as appropriate.

3. This policy should be used in conjunction with the following policies, standards and guidelines:

    - Records Management Guidelines
    - Corporate Retention Schedule
    - Data Retention & Minimisation Policy
    - Acceptable Use Policy

4. This policy applies to all BBC employees and third party suppliers contracted to carry out work on behalf of the BBC.

5. Please note that this policy does not apply to audio and audio-visual output. Please see the relevant BBC Archives policies for information about other types of BBC assets.

## Who can I contact for assistance?

| Contact Information | | |
|---|---|---|
| **Name & Title** | **E-mail** | **Contact Number** |
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## Approval

Approved by: Approved by Erin Stephens Data Protection Officer on 05/12/2020

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# Records Management Policy

## 1. Policy purpose and scope

This policy applies to all records that document, or relate to, the BBC's actions and activities. It applies to all BBC records throughout their life-cycle regardless of their format, the device they were created on, or their storage location.

Third parties contracted to carry out services on behalf of the BBC are responsible for managing their records in accordance with this policy.

This policy does not apply to audio and audio-visual output created by the BBC. Please see the relevant BBC Archives policies for information about other types of BBC assets.

### 1.1 Policy statement

BBC records capture the actions and transactions of the organisation and are a valuable asset to the BBC. Managing them is important if they are to be used in the future as evidence of BBC activities, to help understand why decisions were made, and to provide information which helps inform future decision-making or to exploit our assets.

The BBC is committed to safeguarding records that support the business, to comply with legal requirements such as Freedom of Information and Data Protection legislation and to build an archive in accordance with the Royal Charter and Agreement (Paragraph 86).

- Records should be created to document policies, procedures, decisions, events and transactions, and to serve as reliable evidence.
- The creation of records should be adequate but not excessive.
- All information created during the course of BBC activity is the property of the BBC.
- Every employee has a duty of care to responsibly and adequately manage the records they create or use.
- The information contained within records must accurately reflect the action, communication, or decision being recorded.
- Records must be managed in line with charter, legal, business and heritage obligations.
- Records must be accessible, and subject to an agreed retention schedule.
- Records should be held in a managed structured system that allows them to be found easily.

## 2. Roles and responsibilities

The BBC will continue to provide appropriate resources for records management as detailed in "The Lord Chancellors Code of Practice" under section 46 of the Freedom of Information Act 2000 (part 1 section 7).

### 2.1 Corporate records management

- BBC Archives has a commitment and responsibility to manage the BBC's corporate records within its custody
- Archives are responsible for the development and maintenance of a records management framework. This will enable the BBC to ensure that vital corporate records are managed adequately and will provide a route to the archive for valuable or historical records.
- The responsibility for establishing retention and disposal rules for corporate records lies with the records management function.
- The Corporate Records Manager has operational responsibility for the Records Management Policy

### 2.2 Senior managers

- Senior managers should be aware of relevant legislation and regulations governing records.
- Senior Managers are responsible for ensuring that staff within their divisions and departments understand and adhere to records management guidance.

### 2.3 All Employees

- All BBC employees should be aware of the value of their records and take responsibility for the management of the information that they create or use.
- All employees are responsible for keeping a record of any significant business transaction conducted as part of their duties.
- Employees should know what information they hold and where it is held.

## 3. Processes relevant to managing the risk

### 3.1 Managing records

Good management of records provides confidence in the validity and accuracy of the information and ensures that it can be located when required.

BBC Archives recommends that recordkeeping systems reflect the underlying functions of the BBC rather than the organisational structure. This will allow records to be classified in a context that will hold longevity beyond hierarchical or organisational change and provide greater continuity of the system over time.

Records must not be kept, shared or copied unnecessarily. The Corporate Retention Schedule, provides help by setting appropriate retention periods, identifying master holders of records and giving reasons for destruction of records.

Minimum metadata (data about the record) should be created or captured with the record. This enables systems to be understood and operated efficiently and the records to be located, retrieved and interpreted. Metadata should be kept in such a way that it remains reliable and accessible for as long as it is required.

See the metadata advice in the Records Management Guidelines for more details. They are accessible via this page - https://intranet.gateway.bbc.co.uk/designengineering/bbc-archives/Pages/policies.aspx

### 3.2 Security and storage

Hard copy and electronic documents deposited with BBC Archives will be stored in appropriate secure storage facilities and will only be accessible to authorised users

Vital and important records must not be stored on hard drives, or in email folders. These are not suitable for long-term records management. They should be stored on approved BBC systems so that they will be protected by appropriate backup and disaster recovery procedures

Appropriate levels of security must be in place to prevent the unauthorised or unlawful use and disclosure of information. Paper records containing confidential information must be stored in locked cabinets when not in use, and access only granted to authorised staff.

See the BBC's Information Security Policies for more details.

### 3.3 Restricted records

It is essential that those responsible for managing records are aware of any access restrictions that may apply and take appropriate action to protect those records

Access to restricted electronic data should be controlled through the use of log-ins, passwords and, if appropriate, encryption. Information held in digital systems should be protected from accidental or unauthorised alteration, copying, movement or deletion. If possible, the systems should maintain audit trails allowing all actions to be traced to specific people, dates and times

Restricted data should be marked with the appropriate security marking as set out in the *BBC Information Classification & Handling Standard*

Restricted data is any data that, if lost, could cause harm and includes:

- editorially sensitive information
- investigations data,
- legally privileged data
- children's data
- sensitive personal data including about BBC contributors and talent
- payment card/bank account details
- sources whose identity must be protected
- material that may bring undue media attention to the BBC.

The BBC requires that any restricted data in transit or held on portable electronic devices is encrypted.

See the BBC's Information Security Policies for more details.

### 3.4 Retention

Keeping unnecessary records imposes a risk liability when it comes to servicing requests for information made under the Data Protection Act 2018 and/or the Freedom of Information Act 2000.

The Corporate Retention Schedule has been written to help the BBC comply with the Data Protection Act 2018 and Freedom of Information Act. It helps to ensure that records are not kept longer than necessary and provides justification for why records are no longer held.

Records must be managed in accordance with the BBC Corporate Retention Schedule. This defines how long different types of records and information should be kept, and what should happen when the retention period has expired.

The Corporate Retention Schedule is available online and is accessible to all staff.

The Data Retention & Minimisation Policy outlines the way in which personal data should be managed.

### 3.5. Disposition

Electronic and hard copy records are accepted for permanent retention (archived) if they contain content of long-term value to the BBC. This might be business or re-use value, legal value or historical value.

- **Business/re-use value**
  The records provide information that can be re-used in the creation of new content or other BBC activities. This includes contracts (of staff and contributors), information about intellectual property rights and proof of ownership, programme delivery documentation, agreements with unions and other bodies, and policies.

- **Legal value**
  The records contain evidence which provide protection against, or support in the case of, litigation, or meet legislative or regulatory requirements.

- **Historical/research value**
  The records reflect the history of the BBC, its output, activities and development, its relations with government and individuals, its social impact, or its role in reflecting and contributing to UK and world history.

Where records have been identified as having long-term value to the BBC, departments must deliver them to the archive within the agreed timeframe, in the agreed format, and with appropriate minimum metadata.

Documents under BBC Archives management will be appraised according to agreed selection criteria.

### 3.6 Destruction

Records, including backups and copies, should be destroyed in a secure and timely manner in line with the Data Protection Act 2018 and the Corporate Retention Schedule. Evidence should be kept of destruction decisions.

Records held by BBC Archives will be appraised, and destroyed if;

- they have exceeded their retention period: and
- they have not met selection criteria for the permanent archive

BBC Archives will keep a record of what has been destroyed and why.

Emails will be automatically deleted three years after their received date unless they are tagged or marked for further retention according to the process at the time.

Leavers' email accounts will be deleted after 180 days, unless they are of archival interest

## 4. Details of Key Controls to be implemented

- Appropriate levels of security must be in place to prevent the unauthorised or unlawful use and disclosure of information.
- It is essential that those responsible for managing records are aware of any access restrictions that may apply and take appropriate action to protect those records
- Records must be managed in accordance with the BBC Corporate Retention Schedule
- Where records have been identified as having long-term value to the BBC, departments must deliver them to the archive
- Records, including backups and copies, should be destroyed in a secure and timely manner in line with the Data Protection Act 2018 and the Corporate Retention Schedule

## 5. Internal/external links that may be relevant to managing the risk

This policy should be used in conjunction with the following policies, standards and guidelines:

5.1 Internal

- Records Management Guidelines
- Corporate Retention Schedule
- Data Retention & Minimisation Policy
- Acceptable Use Policy

5.2 External

| **Legislation** | **Useful links** |
|---|---|
| Freedom of Information Act 2000 | https://www.legislation.gov.uk/ukpga/2000/36 |
| Data Protection Act 2018 | https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted |
| BBC Charter | http://www.bbc.co.uk/bbctrust/governance/regulatory_framework/charter_agreement.html#section-1 |
| Broadcasting Act | http://www.legislation.gov.uk/ukpga/1996/55/contents |
| Finance Act | http://www.legislation.gov.uk/ukpga/2009/10/contents |
| Control of Substances Hazardous to Health Act | http://www.hse.gov.uk/coshh |
| Copyright, Designs and Patents Act | http://www.legislation.gov.uk/ukpga/1988/48/contents |
| Limitation Act | http://www.legislation.gov.uk/ukpga/1980/58 |
| Factories Act | http://www.legislation.gov.uk/ukpga/Eliz2/9-10/34/contents |
| Civil Evidence Act | http://www.legislation.gov.uk/ukpga/1995/38/contents |
| Companies Act | http://www.legislation.gov.uk/ukpga/2006/46/contents |

## 6. Policy assurance

The Internal Audit Team will provide a system for monitoring policy compliance by means of audits. This will highlight areas of risk and recommend best practice methodology for improvements to record keeping systems.

The Corporate Records Manager with the BBC Data Protection Officer is responsible for the monitoring, revision and updating of this policy.

## 7. Terms and definitions

### 1. Authenticity

An authentic record is one that can be proven:

- to be what it purports to be;
- to have been created or sent by the person purported to have created or sent it; and
- to have been created or sent at the time purported.

To ensure the authenticity of records, organisations should implement and document policies and procedures which control the creation, receipt, transmission, maintenance and disposition of records to ensure that records creators are authorised and identified and that records are protected against unauthorised addition, deletion, alteration, use and concealment.

### 2. Reliability

A reliable record is one whose contents can be trusted as a full and accurate representation of the transactions, activities or facts to which they attest and can be depended upon in the course of subsequent transactions or activities.

Records should be created at the time of the transaction or incident to which they relate, or soon afterwards, by individuals who have direct knowledge of the facts or by instruments routinely used within the business to conduct the transaction.

### 3. Integrity

The integrity of a record refers to its being complete and unaltered.

It is necessary that a record be protected against unauthorised alteration. Records management policies and procedures should specify what additions or annotations may be made to a record after it is created, under what circumstances additions or annotations may be authorized, and who is authorised to make them.

Any authorised annotation, addition or deletion to a record should be explicitly indicated and traceable.

4. Usability

A useable record is one that can be located, retrieved, presented and interpreted. It should be capable of subsequent presentation as directly connected to the business activity or transaction that produced it.

The contextual linkages of records should carry the information needed for an understanding of the transactions that created and used them.
It should be possible to identify a record within the context of broader business activities and functions. The links between records that document a sequence of activities should be maintained.

5. Accessibility

Records need to be available to all those who need to access them. Capturing detailed metadata will allow both current and future users of records to determine if they contain the information they require or not.

As legislation such as Data Protection and Freedom of Information Acts put greater pressure on the organisation to make information available, it is more important than ever that this tool is used.

**Glossary of records management terminology**

**Accountability**: The principle that individuals, organisations and the community are required to account to others for their actions. Organisations and their employees must be able to account to appropriate regulatory authorities and to the public to meet statutory obligations, audit requirements, relevant standards and codes of practice, and community expectations. (The National Archives: Model Action Plan for achieving compliance with the Lord Chancellor's Code of Practice for the Management of Records – HE and FE organisations 24 April 2002)

**Appraisal:** Process to evaluate business activities to determine the archival worth or evidential value of a record in terms of the quality of its content in relation to stated objectives, standards or criteria. It identifies which records need to be captured and for how long the records need to be kept, to meet business needs, the requirement of organisational accountability. (The National Archives: Model Action Plan for achieving compliance with the Lord Chancellor's Code of Practice for the Management of Records – HE and FE organisations 24 April 2002)

**Archives:** The term 'archive' is often used to describe records that are no longer in daily use and are stored separately from an office's current files (see semi-current). The term is also applied to records that are to be kept permanently because they have historical value (see the life cycle of records). Archives provide evidence of the University's most significant functions and activities, document its policy formation, and trace the development of its fabric and infrastructure (e.g. minutes and annual reports of the Board of Governors, strategic plans, financial reviews).

**Classification:** The process of devising and applying schemes based on the business activities which generate records, whereby they are categorised in systematic and consistent ways to facilitate their capture, retrieval, maintenance and disposal. Classification includes determining document or file naming conventions, user permissions and security restrictions on records. In broad terms it is the process by which records are categorised or grouped into retrieval units, whether by function, subject or other criteria. (The National Archives: Model Action Plan for achieving compliance with the Lord Chancellor's Code of Practice for the Management of Records – HE and FE organisations 24 April 2002)

**Corporate value**: This is a term used within the Objective eRecords system to denote a record of significant value to the University of Portsmouth. A guide to the application of corporate value can be found within
Records Management Factsheet 10 – eRecords

**Disposition**. (Disposition is the implementation of appraisal and review decisions and the term should not be confused with destruction. A review decision may result in the

destruction of records but may also result in the transfer of custody of records, or movement of records from one system to another)

**Electronic records**: Records processed and retrieved by a digital computer; these include text-based word-processed documents, email messages, spreadsheets, presentations, scanned documents, website and multimedia documents.

**Life cycle of records:** The life cycle of a record consists of three phases:
Current: initially a record is current or active while it is used to carry out day-to-day work.
Semi-current: a record becomes semi-current or semi-active when it only needs to be referred to occasionally or has to be retained for a time to comply with legal or regulatory requirements.
Inactive: finally a record becomes inactive and a decision has to be made whether to discard it or keep it permanently because it has historical value.

**Metadata**: Descriptive and technical documentation to enable a system and its records to be understood and operated efficiently, and to provide an administrative context for the effective management of the records. (The National Archives: Model Action Plan for achieving compliance with the Lord Chancellor's Code of Practice for the Management of Records – HE and FE organisations 24 April 2002)

**Migration:** Process of moving records from one hardware or software configuration to another without changing the format. (ISO 15489:2016 Records Management)

**Paper records**: Records in the form of folders, files, volumes, plans, charts etc. (i.e. not in electronic form).

**Preservation**: Processes and operations involved in ensuring the technical and intellectual survival of authentic, useable records through time.

**Record**: Information created, received and maintained as evidence and as an asset by an organisation or person, in pursuit of legal obligations on in the transaction of business. (ISO 15489:2016 Records Management). Records may be in any format (e.g. paper, fax, drawing, plan, video, photo, slide, microfilm, audio recording, CD, email). Records can be sub-divided into three categories:

**Structured:** records held as data in structured, relational databases.

**Semi-structured**: records wherein the layout, composition and content are constrained by the use of approved templates (e.g. forms), to such a degree that a computer could be scripted to identify specific content blocks and take action based upon them (e.g. OCR/ICR, metadata extraction, process automation).

**Unstructured:** records where the lay-out, composition and content are at the discretion of the author.

**Records management:** Field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records. (ISO 15489:2016 Records Management)

**Records system**: Information system which captures, manages and provides access to records over time. (ISO 15489:2016 Records Management)

**Retention schedule**: Document setting out the length of time for which categories or series of records should be kept according to legal, regulatory, business and operational requirements.

**Review:** Process of examining records and assessing whether and for how long they should be retained.

**Version control:** A process that allows for the precise placing of individual versions of documents within a continuum. (The National Archives: Model Action Plan for achieving compliance with the Lord Chancellor's Code of Practice for the Management of Records – HE and FE organisations 24 April 2002)

**Vital records:** Records that contain information needed to re-establish an organisation in the event of a disaster. They are likely to be unique/irreplaceable or required immediately following a disaster. They will provide information for continuing/resuming operations, recreating legal and financial status of an organisation or preserving the rights of an organisation or fulfilling its obligations to its stakeholders.

## Document Control

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