

Records Management, Retention and Disposal

Date Approved:	May 2022
Review Period:	3 years
Policy Owner:	Data Protection Officer (DPO)
Responsible:	Senior Information Risk Owner (SIRO)
Distribution:	Unrestricted – Internal and External

Purpose

Barnardo's is committed to the organised, confidential and secure collection, creation, retrieval, storage, handling, transfer and preservation of its data, information and records to support its business decision-making and to be able to identify and securely destroy information where it has no continuing business, legal or historical significance. Effective records management provides evidence of what we do and why, therefore protecting the interests of all the individuals who access, work for and support our purpose. It sits within in the scope of the Information Governance Statement.

Scope

This Policy applies to information and data in all its forms: whether on paper, stored electronically, held on film, microfiche, or other media. It includes pictures, video and audio as well as text. It covers information transmitted by post, electronically, and by oral communication (including telephone and voicemail). It applies throughout the lifecycle of the information and data from its creation/collection through its use and storage to its disposal.

This policy applies to Barnardo's Trustees, committee members, staff, volunteers, advisers, assessors and contractors. Regarding electronic systems it applies to the use of Barnardo's own computer network and databases and externally or privately-owned systems when connected to Barnardo's network.

This policy sits alongside other relevant information management policies, such as Data Protection and Information Security. All records and information must be stored and handled in accordance with the requirements of the agreed data classification scheme which classifies data in to three types:

	What is it?	Examples are...
Unrestricted information	Any information that could be made available to the public.	Annual Reports, advertising material, brochures and Internet site information.

<p>'Confidential' information</p>	<p>Anything that may be "Confidential to Barnardo's"</p> <p>Any information that relates to an individual and, hence, may be covered by the DPA.</p> <p>Information about our internal business processes that enable us to retain a position as a trusted service.</p> <p>Any information that if released could put individuals or Barnardo's reputation at risk.</p>	<p>Staff directory</p> <p>Business plans, financial information, personnel files, intellectual property.</p> <p>Client information including sponsor and donor information.</p> <p>Any commercial correspondence between Barnardo's and third parties.</p>
<p>'RESTRICTED' information</p>	<p>Detailed information which relates to the commercial and operational strategy of our business.</p> <p>Any information that relates to an individual's sensitive personal data and, hence, may be covered by the DPA.</p>	<p>Details of employee disciplinary hearings</p> <p>Company commercial forecasts, board strategy documents</p> <p>IT (Information Technology) system technical information.</p> <p>Operational security details.</p> <p>Highly sensitive client, donor and sponsor information.</p>

Adherence to this policy should be considered in conjunction with Barnardo's other statutory and regulatory requirements as described below.

Roles and Responsibilities

All Managers are responsible for implementing the policy within their operational areas, and for adherence by staff they are responsible for.

It is the responsibility of all **staff, volunteers, agency workers and contractors** to comply with this policy.

Definitions

What are records?

Records are documents, data and information which are generated by the work of Barnardo's. These documents can be used for the current day-to-day running of the organisation or historical, showing how Barnardo's made decisions in the past. Not every document should be retained for permanent preservation. Collectively, records should reflect the work of our organisation and they should tell anyone who consults them, who we are, how we are run and what we do. Records are scheduled to show what needs to be held, how long and what happens at the end of their lifecycle.

Policy

Retaining Data and Information

Barnardo's retains information and data for three key reasons:

- To comply with legislation and established best practice;
- To support our day to day activities and inform our longer term planning;
- To tell the essential 'story' of Barnardo's and its activities over time through our archive.

Having an archive enables us to make better decisions as we'll know what we've done in the past and how and why decisions were made, as well as allowing us to tell Barnardo's story.

There are significant costs of storing information (either physical or electronic) therefore retaining information and data longer than necessary is a waste of our resources.

Disposing of Data and Information

At the end of an agreed retention period, data and information should be securely and confidentially destroyed, subject to its classification and in line with Barnardo's Retention Schedule.

Electronic and paper information must be disposed of securely to minimise the risk of unwanted disclosure. Sensitive or Official information on paper should be securely shredded, the recommendation is to use a Level 4 or above shredder, which are designed to shred highly sensitive documents by cross cutting into smaller particles.. Unwanted paper documents that do not contain any Sensitive or Official information should be disposed of by recycling.

For the disposal of electronic equipment, please see the [IT Code of Practice](#).

Purpose

By adopting this policy, we aim to ensure that the record, whatever form it takes, is accurate, reliable, ordered, complete, useful, up to date and accessible whenever it is needed to:

- help us carry out our business
- help us to make informed decisions
- protect the rights of employees, service users and the public
- track organisational policy changes and development
- make sure we comply with relevant legislation
- provide an audit trail to meet business, regulatory and legal requirements
- support continuity and consistency in management and administration
- make sure we are open, transparent, and responsive where we need to be
- support research and development
- promote our achievements

Statutory and Regulatory Environment

Charity Regulation

- The Charities Act 2011
- The Charities (Protection and Social Investment) Act 2016

Data Privacy Legislation:

- The UK General Data Protection Regulation
- The Data Protection Act 2018
- The Freedom of Information Act 2000 (where it applies)
- Privacy and Electronic Communications Regulations 2003
- The Environmental Information Regulations 2004

Related guidance and codes of good practice:

- Section 46 Freedom of Information Act – Records Management
- BS ISO15489 – Records Management
- Code of Fundraising Practice - Fundraising Regulator

Associated guidance and documents

- [ISO 15489 Records management](#)

- [Accountability and governance - Documentation](#) – ICO
- [The Code of Fundraising Practice](#) – the Fundraising Regulator

References to other policies

- The Information Governance Statement
- Acceptable Use Policy
- Data Protection Policy
- Barnardo’s CCTV & Monitoring Devices Policy

Compliance

Compliance with this Records Management Policy is mandatory.

Document History

Version	Date	Author	Sign Off	Status	Comment
0.1	06/11/2018	L Goodey		Draft	
0.2	15/02/2019	L Goodey		Draft	Changes made to incorporate the IGS and references to scanner standards
1.0	25.03.20	M. King	SIRO	Approved	
2.0	20.03.20	M. King	SIRO	Approved	Minor changes to link documents within policy
3.0	21.06.21	Martine King	SIRO		Updated to reflect UK-GDPR and Barnardo’s statutory and regulatory requirements
4.0	01.05.22	M King	SIRO	Approved	Reviewed by Director of AA