British Library
Records Management Policy Manual

Table of Contents

1. Introduction

The British Library is dependent upon its records in order to operate efficiently and effectively, and within the requirements of the law.

A comprehensive suite of documents (consisting of a high-level, public-facing Records Management policy approved by the Senior Leadership Team, and a set of supporting procedures and guidance approved at operational level) together explain how Records Management is implemented throughout the Library. These documents collectively form the Library's **Records Management Policy.**

This manual ties all of those documents together in a reference document that provides context and a level of additional detail that it would be impossible to include in the public-facing policy document. This manual also demonstrates how the Records Management Policy aligns itself with ISO15489, the international standard code of practice for Records Management.

This manual explicitly defines staff responsibilities for complying with the Library's Records Management Policy.

This manual also outlines basic principles for:

- Record creation
- Record storage
- Record capture and registration
- Record classification
- Record access control and tracking
- Record use and reuse
- Record migration and conversion
- Record retention
- Record disposition
- Record systems
- Documentation of Records Management procedures, processes and systems
- Monitoring and auditing of Records Management
- Provision of Records Management Training

All staff are required to act in line with their specific responsibilities for Records Management.

Specific responsibilities can be identified throughout this document by the use of boxed out bold font (like this), and by use of the word "must".

These responsibilities are placed in context throughout this document.

2.   Definitions

- **Declared Record -** A *Record* compiled in accordance with the formal processes mandated by the Library and in force at the time in order to provide evidence of activity or decision, but not automatically output from a routine line-of-business process. This will include, but is not limited to, formal minutes, project management records, activity-specific line-management files, and subject-specific correspondence files.

- **Document -** A collection of information in either hardcopy or electronic format that can be treated as a discrete unit stored in unstructured storage. A document may or may not be (or become) a *Record*, or part of a *Record*.

- **Registered Record –** All *Declared Records* and *Transactional Records.*

- **Record -** A collection of information, in any format or medium, created or received by the Library at designated points in specific business processes, and assembled or retained for one or more of the following purposes:
  - Proper recording of activities undertaken by the Library
  - Evidence of a transaction and its terms in the event of a dispute
  - Audit
  - Provision of intellectual input into future business decision making processes.
  - Compliance with legislative, regulatory or professional requirements

  Documents created or in use for other purposes are not considered to be Records for the purpose of this policy. *Documents* and *Structured Data* may become records if they are subsequently retained in static format for one of the purposes stated above.

- **Metadata** structured or semi-structured information that describes or provides information about records and other entities involved in the management of records, in order to support or enable the creation, management and use of records.

- **Records Management -** A series of integrated and embedded processes and procedures related to the filing, retrieval, storage and disposal of *records*. Records Management serves a compliance and risk management function, ensuring that records belonging to the Library are authentic, reliable and usable, and that their integrity can be proven by audit.

- **Structured Data** - Data held in structured line-of-business systems as evidence of a transaction with a third party, or for legal or regulatory compliance. Structured Data is considered to be a *Record* for the purpose of this policy, but is not considered to be a *Registered Record.* Structured Data is primarily managed in accordance with the **Information Asset Management Policy**, although the requirements of the Records Management Policy in relation to *Records* (but not *Registered Records*) also apply to Structured Data.

- **Transactional Record** - A *Record* input or output from a structured business process in either hard-copy or electronic form as evidence of a process-driven interaction with a third party, normally for legal or regulatory compliance purposes or in support of line-of-business activities. This will include, but is not limited to, contract files, invoices, customer-specific correspondence files, and personnel files.

3.   Benefits of Records Management

The Library's Records Management Policy exists to:

- instill good Records Management practice across the Library, allowing business to be conducted in an orderly, productive, efficient, transparent and accountable manner

- manage the Library's Registered Records so that they can be used as an effective information source, supporting and documenting corporate activity, policy formation and decision making processes

- improve reliability of, and confidence in, Registered Records

- provide confidence to external regulators and auditors that the Library's Records and business practices are robust and reliable

- improve the speed and efficiency with which information can be retrieved from Records in order to allow the Library to deliver services in a consistent manner

- optimize the use of space for the storage of Registered Records and to develop and maintain systems of low cost storage with appropriate location, regular review and appropriate disposal processes

- maximize the evidential weight which a court or other body may assign to presented Registered Records

- ensure that Registered Records vital to the overall operation of all parts of the Library are identified and preserved

- meet statutory and regulatory requirements, and provide protection and support in litigation including the management of risks associated with the existence of (or lack of) evidence of organisational activity

- ensure that Registered Records are managed throughout their lifecycle in the medium most appropriate for the task they perform

- ensure that Registered Records are protected and kept secure in a manner commensurate with their value and retention period, and provide continuity in the event of a disaster

- ensure that the creation and maintenance of Registered Records is the responsibility of those members of staff who carry out the task or process that is being documented.

4.   Roles & Responsibilities

The Senior Leadership Team has overall responsibility for Records Management in the British Library, and Directors will endorse the policy, support its implementation, and champion the need for good Records Management practices within their own Division. Operational responsibility is delegated to the Head of Corporate Information Management.

The Head of Corporate Information Management is responsible for ensuring that this Policy remains up to date and fit for purpose, and for delegating day-to-day enactment of the Library's Records Management Policy to the Records Managers.

The Records Manager(s) are responsible for all aspects of Records Management, including the design and implementation of Records Management systems, controls and procedures, for providing guidance and assistance as may be required to support such systems, controls and procedures, and for training Library staff in good Records Management practice as it relates to their own roles.

The Corporate Information Management Unit (CIMU) is responsible for supporting the Records Managers in their roles, and for ensuring that Registered Records stored in the Records Centre are recorded and stored appropriately, and available to other staff as required.

Line Managers are responsible for ensuring that appropriate Registered Records are created to document the business processes and transactions of the business unit for which they are responsible. Each Line Manager is also responsible for ensuring that their team applies the principles, standards and processes of Records Management as described in this Policy or may from time to time be provided by the Records Managers in support of this Policy.

All members of the Library staff (including contractors, volunteers or other temporary employees) are responsible for keeping complete and accurate Records of their business activities as required by law or by Library policy and practice.

These roles and responsibilities are further explained throughout the remainder of this manual.

5. Records Management Policy

5.1 Regulatory Environment

The British Library intends to comply with all requirements of both international and local regulatory environments that affect the Library's activities, and with the associated requirements to document those activities. The Library intends to comply with the requirements of the Lord Chancellor's Code of Practice on the management of records issued under section 46 of the Freedom of Information Act 2000. As far as is practicable, the Library intends to comply with ISO15489, the recognised international standard of best practice for records management.

The Head of Corporate Information Management is responsible for ensuring that the Library's Records Management Policy complies with the requirements of the Library's regulatory environment, with appropriate input from the Records Managers.

The regulatory environment may at any one time consist of:

- Statute, case laws and regulations governing the public sector, the general business environment, and the specific use of records and information
- Mandatory standards of practice
- Voluntary codes of best practice
- Voluntary codes of conduct and ethics
- Identifiable expectations of the community for acceptable behaviour of the public sector

5.2 Analysis of Business Context and Risk

The decision about what records need to be created and captured should be informed by an analysis of business context and risk, including:

- the legal and regulatory environment the Library operates in and any associated recordkeeping requirements
- the Library's need to document its functions, transactions and processes for business purposes
- community and societal expectations for recordkeeping
- an analysis of the risk posed to the Library if its records are not created, captured and managed appropriately

Line Managers are responsible for determining what records need to be created and captured based on their own knowledge and analysis of business context and risk.

From time to time the Records Manager(s) may conduct an analysis of business context and risk necessary to inform what records the Library should be creating and capturing, and how they should be managed. This analysis may result in the identification of new registered records and registered records at risk of loss. In such instances the Records Manager(s) may stipulate controls to ensure that these records are managed appropriately and to prevent their loss.

5.3   Record Creation

The British Library intends to systematically create and maintain authentic, reliable and usable Registered Records, and protect the integrity of these Registered Records for as long as required to support the continuing conduct of business, comply with the regulatory environment, and provide necessary accountability.

All Records, regardless of format, created or received by the Library or its employees in the course of business are the property of the British Library. Records (and in particular, Registered Records) therefore should be available to all Library staff as required, unless there are legitimate reasons to restrict access.

All staff must ensure that Registered Records belonging to the British Library are created, stored, used and disposed of in accordance with the Library's relevant policies and associated procedures and guidance.

A Registered Record should correctly reflect what was communicated or decided upon and/or what action was taken, and thereby support the needs of the business to which it relates. The business context in which the Registered Record was created, received or used should be apparent in that Record, including the date of the transaction, and the participants involved. Information should be recorded at a level of detail appropriate to the business need and range of use of the Record. Registered Records should be created, maintained and managed systematically, in accordance with documented policies, assigned responsibilities and formal methodologies.

Line Managers must ensure that any necessary Registered Records are created at the time of the event, business or transaction to which they relate (or as soon afterwards as is practicable), by staff who have direct knowledge of the facts, or by systems routinely used within the Library to conduct the business or transaction in question.

A Registered Record should be *authentic*. 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.

A Registered Record should be *reliable*. A reliable Record is one whose contents can be trusted as a full and accurate representation of the transactions, activities and facts to which it attests, and can be relied upon in the course of subsequent activities and transactions. The level of detail recorded should be appropriate to the purpose of the Record, and the assessment of risk arising from having incomplete Records of the business activity.

A Registered record should have *integrity*. A Record has integrity if it is complete and unaltered. Any additions, annotations or deletions to a Record after creation should be explicitly indicated and traceable.

A Registered Record should be *useable*. A useable Record is one that can be located, retrieved, presented and interpreted. It should be capable of being presented as directly related to the specific business activity or transaction that created it, and carry the information necessary for an understanding of that transaction or activity that it records.

In addition to its content, a Registered Record should be labelled with relevant information that enables it to be permanently linked to all related Records for a particular transaction. For example, a contract file should be clearly marked with the relevant contract number so that it can be easily associated with all other documentation also relevant to that particular contract.

Based on an analysis of business context and risk, the Line Manager of each business unit (or Business Owner of each business process) must ensure that appropriate Records are created to document the work of the business unit for which they are responsible, with input from CIMU where necessary.

The Chair of a Committee (or other equivalent group) is responsible for ensuring the creation of Registered Records in relation to the business of that committee.

A Project manager is responsible for ensuring the creation of Registered Records in relation to the Project that they manage.

A Registered Record should always be created to document any action or transaction that:

- commits the Library to an action
- imposes a responsibility or obligation upon the Library
- comprises information connected to the accountable business of the Library

The Line Manager of each business unit must determine the information that needs to be included in the Registered Records for which they are responsible, with input from CIMU where necessary.

All staff must ensure that the Registered Records they create follow the instructions issued by their Line Manager, and that they are accurate, comprehensive, legible, dated, signed (where appropriate), relevant, objective (as far as is possible in the given context), and non-offensive.

The appropriate creation and storage of Registered Records for each stage of the Library's routine business should be written into the training procedures for each core process, in order that Records Management activity is embedded at the heart of the Library's working practice. CIMU will incrementally develop a register of Registered Records from each of the Library's core business processes.

All staff must ensure that all Registered Records they create are stored appropriately, and that transient documents of no further value to the business are disposed of at the earliest opportunity.

CIMU will from time to time publish guidance on the Library's Intranet about what constitutes a Registered Record and what documents should legitimately be disposed of as soon as their use is at an end.

5.4   Record Storage

The British Library intends to preserve its Registered Records and make them accessible over time in order to meet business requirements and community expectations by ensuring that they are maintained in a safe and secure environment, and that they are stored on media that ensures their usability, reliability, authenticity and preservation.

In the first instance, Line Manager's are responsible for defining where and how and in what format the Documents, Records, and Registered Records created by their team are to be stored (with input from CIMU where necessary), taking into account the needs of their business to find, retrieve, use, update and protect the information they contain.

When there is no longer any business need to maintain that information in local storage, Line Managers are responsible for ensuring that obsolete Documents are disposed of, and that Registered Records are transferred to the Records Centre or Corporate Archive as appropriate.

The Records Managers are responsible for the determination, implementation and continual reassessment of efficient and effective means of maintaining, handling and centrally storing the Library's hard-copy Registered Records once they are no longer of immediate business use in order to ensure that they are protected, accessible and managed in a cost effective manner.

The design of the Library's Record Centre (or equivalent outsourced services) should take into account:

- Retrieval requirements – the retrievability of Registered Records should be the major consideration in the design of storage solutions. Rapid or frequent retrieval requires that the location be easily accessed.

- Volume and growth rate of Registered Records – projected growth rates may eliminate some storage solutions from consideration if their growth capacity in insufficient. Choice of storage media should also be matched to assumed volume and growth of the Registered Records.

- Record usage – the various uses of the Registered Records should determine the necessary levels of protection against loss or damage (see section on Vital Records).

- Record security and sensitivity needs – some Registered Records require limitations on access for reasons of confidentiality, proprietary nature of the information or legal protection.

- Physical characteristics – Registered Records should be protected from fire, flood, water damage, vermin and contaminants, and other risks. The physical nature of the Registered Records stored in the Records Centre means that other factors will influence choice of storage solutions, such as weight, floor space required, and the need for temperature or humidity controls. The Records Centre should provide controlled access to storage areas. Shelving should be suited to the format of the Registered Records and strong enough to bear the potential load. Containers and packaging should be able to withstand handling and the pressure exerted by contents and should not damage the Registered Records in storage in any way.

- Third party service – if a third party service provider is used to store, process or deliver Registered Records, service level agreements must be drawn up to state the rights and responsibilities of both parties. All transactions should be thoroughly documented.

- Disaster recovery – the Records Centre should be assessed for disaster preparedness to ensure that risks are identified and mitigated. Insofar as possible, integrity of the Registered Records should be demonstrably maintained during and after recovery from disaster (see also 4.5 Vital Records).

Technology Operations, in consultation with CIMU, is responsible for the determination, implementation, documentation and continual reassessment of efficient and effective means of ensuring that the Library's electronic Records, Registered Records (in the eRecords Centre or elsewhere) and other Documents are adequately backed-up, protected, and accessible.

5.5 Record Capture and Registration

The British Library intends to maintain an accurate register of the Registered Records that it creates or holds, in order to provide evidence that a Registered Record has been created and facilitate retrieval of that Registered Record as required.

5.5.1 Capture and Registration of Records (Hard-copy)

The Line Manager of each business unit must determine the most appropriate format for the capture of each record type in relation to its purpose, with assistance from CIMU as required. A record may be retained in hard copy, electronic format, or (occasionally) both. This decision must be communicated to all staff within their department.

Each business unit is responsible for maintaining its own hard-copy Registered Records whilst they are in regular use, under the direction of the appropriate Line Manager, and with assistance from CIMU as required. Each business unit should have an area available to it for the storage of hard-copy Records. This area should be kept in a tidy, safe and organised fashion at all times.

The space available for storage of a business unit's hard-copy Records is extremely limited. Once a hard-copy Registered Record is no longer required for regular use it should be transferred to the corporate Records Centre (if the record is within its set retention period for business purposes) or to the Corporate Archive (if the Record is no longer required for business purposes and it is intended that that Record should be retained indefinitely for public record purposes or other historical or perpetual legal interest.)

CIMU will from time to time publish guidance on the Library's Intranet about how hard-copy records should be transferred to the Records Centre or to the Corporate Archive.

The most efficient method of creating an accurate register of hard-copy Registered Records is to have a central point of capture. CIMU's corporate Records Centre serves as this central point of capture for the Library.

The Records Manager(s) are responsible for determining the metadata that should be registered for each hard copy Registered Record deposited in the Records Centre, in consultation with the document's owner. CIMU shall be responsible for recording such metadata as may be appropriate in the central register and for ensuring that the metadata is fixed and unalterable. As far as possible CIMU will ensure that only a single copy of a record is maintained in the Records Centre or Corporate Archive and that any duplicates are disposed of.

As far as possible, the registration of each Registered Record in the Records Centre should record the following:

- A unique identifier, such as a barcode or file number
- The class or type of record, allowing the record to be placed in business context
- The date and time of registration
- The owner of the document, at team level or lower

- An abbreviated description (e.g. type of file, type of business), including the party or parties involved

- The period covered by the record

- Any restrictions on access

- Retention Period

- Any other contextual information useful for management or audit purposes

When a staff member leaves their current role within the Library, Line Managers are responsible for ensuring that any records the staff member has delegated responsibility for managing, are captured into the relevant Library recordkeeping system; and that responsibility for the records has been transferred to another staff member.

5.5.2   Capture and Registration of Records (Electronic)

The Line Manager of each business unit must determine the most appropriate format for the capture of each Registered Record in relation to its purpose, with assistance from CIMU as required. A Registered Record may be retained in hard copy, electronic format, or (occasionally) both. This decision must be communicated to all staff within their department in relation to each type of Registered Record that they create or receive.

Each business unit is responsible for maintaining its own electronic Registered Records whilst they are in regular use, under the direction of the appropriate Line Manager, and with assistance from CIMU as required. Each business unit should have an area on a shared drive (normally the G:Drive) available to it for the storage of electronic Records. This area should be kept in a tidy, safe and organised fashion at all times. Records in document format (unstructured records) may be held in other Library-sanctioned document and record repositories, with the approval of CIMU, where the functionality offered by shared drives is not sufficient. CIMU will from time to time publish guidance on the Library's Intranet about how to structure the storage of electronic Records. Structured Data should be stored in the appropriate System in accordance with all relevant policies and procedures in force at that time in relation to that System.

The space available for the storage of a business unit's electronic Records may become cluttered, and the use of systems may occasionally be discontinued. Once an electronic Registered Record is no longer required for regular use (or its current storage system is due to be decommissioned) it should be transferred to the corporate eRecords Centre (if the record is within its set retention period and required for business purposes) or to the Corporate Archive (if the Record is no longer

required for business purposes and it is intended that that Record should be retained indefinitely for public record purposes or other historical or perpetual legal interest.)

CIMU will from time to time publish guidance on the Library's Intranet about how electronic Registered Records should be transferred to the eRecords Centre or to the Corporate Archive.

The Records Manager(s) are responsible for determining the metadata that should be registered for each electronic Registered Record deposited in the Records Centre, in consultation with the document's owner. CIMU shall be responsible for recording such metadata as may be appropriate in the central register and for ensuring that the metadata is fixed and unalterable.

As far as possible, the registration of each Record should record the following:

- The class or type of record, allowing the record to be placed in business context

- An abbreviated description (e.g. type of business etc.), including the party or parties involved

- The period covered by the record

- Any other contextual information useful for management or audit purposes

- The date and time of capture should be recorded automatically by the system

- The member of staff who created the record should be recorded automatically by the system

- The file format should be recorded automatically by the system

Where the registration of an electronic Record requires that it be given a name, either in the business unit's own storage or in the central register, staff should ensure that the name given is meaningful and describes the contents of the Record; arbitrary or personal naming conventions should not be used. CIMU will from time to time publish guidance on the Library's Intranet about how electronic Records should be named.

Some electronic Documents may contain embedded automatically executable code (e.g. a macro) which can have the effect of modifying the file each time it is retrieved, viewed or printed. The existence of such code with in a file means that the Document can not be frozen in such a way as to provide a permanent evidential Record, since it is almost impossible to determine what changes have been made or what data the file originally contained. Where a member of staff is transferring an electronic Registered Record to the eRecords Centre they should first ensure that all macros have first been disabled or removed from the file. Where the use of such code in a record is unavoidable, this should be noted in the associated metadata, and an additional record should be created and stored containing only the original data.

Where a record consists of a compound document (e.g. a word processed document which includes a linked spreadsheet), the member of staff transferring the electronic Registered Record to the eRecords Centre should ensure that all of the various component parts of the Record are transferred. This will ensure that it is possible to reconstruct the compound Record at some time in the future.

Some Records in the eRecords Centre may need to be replaced from time to time due to updated information. The updated version should replace the original Record in the eRecords Centre, but CIMU should ensure that the original is assigned a version number and retained for audit purposes. Versions should not be deleted without consulting a Records Manager. If the deletion of a version is required for technical reasons, this should be noted in the metadata of the Record that is retained.

As far as is possible CIMU will ensure that only a single copy of a Registered Record is maintained in the eRecords Centre and that any duplicates are disposed of.

When a staff member leaves their current role within the Library, Line Managers are responsible for ensuring that any records the staff member has delegated responsibility for managing, are captured into the relevant Library recordkeeping system; and that responsibility for the records has been transferred to another staff member.

5.6 Record Classification

CIMU is responsible for classifying Registered Records in the central repositories, and for advising individual business units on how to structure their own Record keeping. Registered Records should ideally be classified in a hierarchy that reflects the organisation of business activities carried out by the Library, in order to:

- provide links between individual records which accumulate to provide a continuous record of business activity

- ensure records are named in a consistent manner over time

- assist in the retrieval of all records relating to a particular function or activity

- determine security protection and access appropriate for sets of records

- allocate user permissions for access to, or action on, particular groups of records

- distribute management responsibility for particular sets of records

- determine appropriate retention periods and disposition actions for records

- Classification should move from the most general to the most specific concept (e.g. from high level function to specific transaction).

Terminology used in classification should wherever possible be derived from business functions activities and processes, not from names of organisational units. Terminology should consist of sufficient discrete groupings and sub-groupings to include all of the business functions and activities being documented, and be devised in consultation with the document owners.

Terminology should, as far as possible, consist of unambiguous terms reflecting organisational usage. Classification schemes should be designed and implemented to provide a consistent and standard way of communicating across organisational units sharing the same information for interrelated functions. Where necessary this should be supported by vocabulary controls (such as thesauri) suited to the complexity of the records. Such controls should explain organisation specific definitions or usage of terms.

The Records Managers are responsible for ensuring that classification schemes and terminology are up to date and reflect changes in the functions and activities of the Library, and that terminology is consistently used within Records Centre processes.

5.7 Metadata Schemas

Metadata schemas should be developed to define the metadata required to identify, describe and manage the Library's Registered Records. This may include metadata schemas developed for the records themselves and other entities such as: the agents involved in the creation and management of the records, or processes relating to the records.

Metadata schemas devised for these entities may include some or all of the following:

- Identity metadata – information to identify the entity

- Description metadata – Information to determine the nature of the entity

- Use metadata – information that facilitates immediate and longer-term use of the entity

- Event plan metadata – information used to manage the entity, such as disposition information

- Event history metadata – information regarding past events on both the entity and its metadata

- Relation – information describing the relationship between the entity and other entities

Metadata schemas should be developed in formats that enable interoperability across systems and processes and should be utilized in the design and implementation of systems and processes.

The Records Manager(s) are responsible for defining the metadata and metadata schemas required for and appropriate to the management of the Library's Registered Records.

5.8 Protective Markings

All Records should be protected and handled in ways appropriate to the sensitivity of the information contained, as set out below and elsewhere, such as in the Library's Information Security Policy.

The Library is a public body and therefore subject to the mandatory requirements of Governments' Security Policy Framework (SPF), which includes a requirement to implement the Government Protective Marking System (GPMS). The Library however holds no Records that fall into the definition of 'Classified' (e.g. **Top Secret** or **Secret**) and is therefore exempt from the SPF mandatory requirements relating to the GPMS. Unless otherwise specified, all Records belonging to the British Library should be considered as **Official** in relation to the GPMS.

As part of the Library's routine business Line Managers (or the Records Managers) may choose to declare that the Registered Records generated by a specific process or System within their Business Unit require a higher level of protection (e.g. personnel files, financial data). Any such additional controls should be implemented at a process or System level, and should normally consist of specific controls other than classification and marking. All staff members are required to comply with any specific handling instructions that they are given (or as may be published from time to time) in relation to specific Registered Records or types of Registered Record that require an increased level of protection.

5.9   Vital Records

Vital Records are those Registered Records without which the Library (or a defined subsection of the Library) can not continue to operate, or which are needed to re-establish that operation in the event of a disaster, or which are deemed essential in order to protect and defend the rights and interests of the Library.

The Library's electronic Records are assumed to be adequately protected by routine IT processes and policies relating to backup and security. Vital Records in electronic form for the most part exist as Structured Data, and adequate protection and recovery options for these Records should appear in Divisional incident management & recovery plans.

The Records Managers will protect Vital Records in hard-copy format that are committed to the Records Centre in whatever manner seems to offer the best level of protection in relation to the value of the Record and the additional expense that protection will incur (For example, hard-copy surrogates and dispersal across sites, digital surrogates, secure onsite storage, remote storage, hybrid combinations). Due to the expense inherent in adequately protecting the Library's Vital Records the Records Managers will have sole responsibility for determining whether or not a Registered Record committed to the Records Centre should be classified as 'Vital', although they will consider representations from the Record owner.

5.10 Access Control and Tracking

The British Library intends to protect its Registered Records from unauthorised access, use, disclosure, alteration or destruction by ensuring that Registered Records are only released to those who are authorised to see them, and that Records-related processes and transactions are only undertaken by those authorised to perform them.

Access to the Library's hard-copy storage areas in the Record Centre shall be restricted to CIMU staff and nominated representatives to minimise the chance of inadvertent or malicious tampering causing Registered Records to be lost or destroyed.

Only CIMU staff with the relevant access rights will be permitted to amend or delete metadata relating to stored Registered Records.

CIMU is responsible for ensuring that confidential hard-copy Registered Records, once deposited in the Records Centre, are accessed only by persons within the Library who are authorised to access that specific Record. If access to a hard-copy Registered Record is restricted, CIMU will record the persons specifically permitted to access the information as part of the Record capture process.

The movement of all hard-copy Registered Records after deposit in the Records Centre will be tracked to identify those who have or have had custody of a record and ensure that Registered Records can always be located when required, and such tracking audit information will form part of the metadata associated with each Record.

Any member of staff who checks out a Registered Record from the Records Centre is responsible for the security of that Registered Record until it is returned to the Records Centre, and must ensure that it can be accessed immediately should it be required.

If, in exceptional circumstances, a member of staff retrieves a Registered Record in order to send it outside of the Library that member of staff remains responsible for the record until it is returned to the library and re-deposited in the Records Centre. Please note that this is not standard practice and Registered Records should not be sent outside the Library without the permission of CIMU.

The Records Managers, in consultation with Technology Operations, shall be responsible for ensuring that electronic Registered Records in the eRecords Centre are accessed only by persons authorized to access that specific Record through the use of adequate secure access procedures. Access to all electronic Registered Records stored in the eRecords Centre shall be tracked to identify those who have in any way accessed a Record, such tracking audit information forming part of the metadata associated with each Record.

Tracking of the movement and use of Records within a Records System is required to identify outstanding action required, enable retrieval, prevent loss of records, identify the operational origins of individual Records, and monitor usage for Systems maintenance and security. As a security measure, tracking individual Record movements ensures that only those users with appropriate permissions are able to access individual Records and that temporary ownership of retrieved hard-copy Records is appropriately assigned. Patterns of Record usage are also useful for establishing the currency of the information contained in the Record and may provide a measure for determining if retention periods should be extended.

Where appropriate, changes to access permissions shall be recorded as process metadata to serve as an audit trail for access to records at a given point in time.

CIMU will have the tools to redact records prior to publication or release to the public in complying with Freedom of Information legislation, as a form of access control.

5.11   Use and reuse

The British Library intends to ensure that its Registered Records are usable and reusable for as long as they are retained.

For records held in the Records Centre, CIMU are responsible for ensuring that records are initially captured and stored in a usable format and reserve the right to refuse to accept records that are not presented in an accessible and usable format, including electronic records transferred on physical storage media.

For records held in the Electronic Records Centre, CIMU will take responsibility for ensuring that records are converted into alternative formats or their content copied to a new format or record, where the current format has, or will become, unusable. CIMU will also be responsible for ensuring that the Electronic Records Centre is maintained within a system that supports the ongoing use and accessibility of records held within it, and will take steps to upgrade or replace the system, or migrate records to an alternative usable platform, where this is no longer the case. Conversion and migration of records will be captured as process metadata as part of the evidence of events that have occurred during a record's lifetime.

For the hardcopy Records Centre, CIMU take responsibility for ensuring that storage conditions are adequate to support the usability of hard-copy records held there for periods of up to 100 years. Where electronic records have previously been deposited at the Records Centre on physical storage media (for example, floppy disks, CDs, USB sticks), CIMU will not be able to guarantee the accessibility and usability of these records. CIMU will be responsible for ensuring that the system used for the registration and management of hardcopy records supports the ongoing usability of the records.

CIMU will support the reuse of records held in the Records Centre through the copying of record content to create new records with independent metadata.

Line Managers are responsible for ensuring the ongoing use and reuse of Registered Records held in local repositories and systems, not under the control of CIMU.

5.12   Migrating and Converting Records

The British Library intends that the process of migration and conversion between systems holding Registered Records (including digitization activities) is sufficiently planned, documented and communicated to stakeholders and managed in way that ensures the authenticity integrity, reliability and usability of the records.

This includes ensuring that during migration and conversion, all records and their associated metadata are retained in their originating system or format until the process has been completed

and the authenticity integrity, reliability and usability of the records in destination system or format has been assured. The disposition of the source records must be authorized by the relevant Line Manager or CIMU.

Records of migration and conversion processes should be retained sufficient to ensuring an auditable record of the process.

> **Line Managers should ensure that CIMU are consulted on any plans to migrate or convert Registered Records**.

5.13   Record Retention

The British Library intends to retain its Registered Records for as long as necessary to satisfy all of the requirements of the legal and regulatory environment, applicable standards and organisational policy.

Record retention should be managed to:

- meet current and future business needs by retaining information concerning past and present decisions and activities as part of the corporate memory to inform decisions and activities in the present and future

- retain evidence of past and present activities to meet accountability obligations, and comply with legal requirements

- eliminate as early as possible and in an authorised, systematic manner records which are no longer required

- retain the context of the record to enable future users to judge the authenticity and reliability of records even if the records system in which they are retained have been changed or closed

- meet the current and future needs of external stakeholders by identifying the enforceable or legitimate interests that stakeholders may have in preserving the records for longer than they are required by Benfield itself

- identify and assess legal, financial, political, social or other positive gains from preserving records to serve the interests of research and society as a whole

Record retention periods should be based upon an analysis of business context and risk, including: an assessment of the regulatory environment, business and accountability requirements, the rights and interests of all stakeholders, and the risk that would be entailed by failure to have authoritative records of activity. The retention period should be set at the minimum amount of time to satisfy all of these interests.

Where practical, records retention period should be applied to the largest group or aggregation of records or record series possible in order to provide the most simple and easily maintainable framework for retention management.

The appropriate retention period should be clearly associated with each Registered Record as part of the registered metadata, with trigger events and disposition actions clearly identified.

The Records Managers are responsible for advising business units of the appropriate retention periods for their Records, and ensuring that all statutory and regulatory requirements are taken into account. Once a retention schedule has been drawn up for a business unit it must be signed off by the Head of Corporate Information Management and the relevant Director before CIMU will use it as the basis on which to dispose of records. CIMU will maintain a central record of all retention schedules currently in force.

The retention period for collections of miscellaneous Documents shall be set at the longest period required by any of the component documents.

Where hard-copy Records have been scanned in order to be held electronically then the hard-copy Record may be disposed of immediately, providing that the electronic copy is of sufficient quality that no material information will be lost, and that the source document contains no physical amendments or annotations that may not be apparent as such in the electronic copy, and that the source document is not relevant to any pending or actual litigation or investigation. Where the original Record is of poor quality or has been amended, it is necessary to keep the original to reduce the possibility of it being suggested that the image was deliberately altered or made illegible, and the risk of rejection of the image on the grounds that it is not a true facsimile of the original document. The retention period of the hard-copy original in this case should be set at the full retention period required for Records of that type.

The Board Secretary is responsible for informing the Records Managers of any pending litigation or investigation as it becomes apparent, in order that retention schedules and destruction programs may be amended or halted as necessary. Records relating to pending or actual litigation or investigation should not be destroyed under any circumstances, as the destruction of documents under these circumstances is normally a criminal offence.

5.14 Disposition of Records

The British Library intends to retain its Registered Records only for as long as they are needed or required, and to dispose of unnecessary Records in a way that preserves the confidentiality of the information they contain. As far as possible, the Library intends to dispose of unnecessary Records by means of environmentally friendly processes.

Routine disposal of unnecessary Records is required to limit the increasing costs of storage. Additionally, older Records and transient Documents may create liability when in later years they can not be put into context or can no longer be explained.

Upon the expiry of the retention period of a specific Registered Record stored in the Records Centre, the status of the Record shall be marked as 'Awaiting Destruction' in the central register. CIMU is responsible for informing the Records Managers and the record owner (e.g. the relevant business unit Line Manager) that a Registered Record is awaiting destruction. The Line Manager and/or Records Managers shall be responsible for communicating to CIMU any compelling business reason or regulatory requirement that requires the record to be retained for a further period. Upon such notification CIMU will update the retention period and status of the Registered Record in question in the central register. After 28 days, any record that remains marked as 'Awaiting Destruction' will automatically be disposed of.

> **When notified that a Registered Record is awaiting destruction the Line Manager must respond to CIMU within 28 days of receipt if they are aware of any reason for retaining the Record for a longer period. Non-response to the notification will be considered permission to dispose of the Record on the Line Manager's authority.**

If no business owner can be found for an expired record then the Records Managers shall be solely responsible for its disposition decision. Where a Registered Record is older than seven years the Records Managers shall be solely responsible for its disposition decision and the business owner will not be contacted.

Upon the expiry of the retention period of a specific Transactional Record where a current Retention Schedule is in force the Record will be destroyed automatically as the relevant Director has already pre-authorised the disposal decision.

CIMU will maintain a complete register of all disposition actions in order to meet statutory and regulatory requirements.

Where Records have reached the end of their retention period without being transferred to the Records Centre then the Line Manager of the relevant business unit is solely responsible for any disposition decision, advised by CIMU as required.

> **Line Managers must ensure that all Records containing personal information that are held within their business unit are disposed of after their retention period elapses, in order to meet the Library's Data Protection responsibilities.**

The physical destruction of hard-copy Registered Records will be carried out in a way that guarantees the complete destruction of any information contained therein. Destruction certificates

are required to confirm all disposition actions carried out on behalf of the Library, in order to meet statutory and regulatory requirements. Where possible, such disposition of hard-copy Registered Records shall be carried out in an environmentally friendly manner, in accordance with the Library's Corporate Social Responsibility Policy.

Where electronic Registered Records are to be destroyed they may be destroyed by any method where it can be guaranteed that the process can not be reversed – for Registered Records captured in the eRecords Centre system such processes are managed within the system itself, although all external system pointers to the record and all backup copies and versions must be disposed of before effective destruction of the electronic Record is complete.

Certain of the Library's Registered Records may be of historical or social value beyond their statutory or operational period of retention. Ideally these Registered Records should be passed to the Corporate Archive rather than the Records Centre at the end of their retention period for business purposes and Line Managers should consider any potential social or historical value inherent in Records they are considering disposing of within their own business units. Where the Records Centre does hold such Registered Records, CIMU will transfer them from the Records Centre to the Corporate Archive at the end of their retention period.

5.15   Records Systems

Any software and procedures deployed by the British Library to manage its Registered Records must be capable of capturing, managing and providing access to the Library's records over time.

Records Systems Characteristics

Records Systems shall:

- be capable of continuous and regular operation

- be capable of supporting simultaneous work by multiple operators

- routinely capture all records within the scope of the business activities it covers

- organise the records in a way that reflects the business processes that created them

- protect both the records and the register itself from unauthorized alteration or disposition

- routinely function as the primary source of information about the records held

- provide ready access to all relevant records and related metadata

- be capable of supporting alternative options for the location of hardcopy records

- present records in a usable form

- store records for as long as they are needed

- be capable of disposing of records when they are no longer needed

- capture actions carried out in relation to the records, sufficient to demonstrate their authenticity and reliability

- facilitate the import and export of records and their metadata to ensure the retention of records beyond the current system

Control measures such as access monitoring, user verification, authorized destruction and security should be implemented within any system deployed, in order to prevent unauthorized access, deletion/destruction, alteration or removal of records. These controls may reside within the records system or be external to the specific system.

5.15.1 Record Registration System Characteristics (Hard-Copy)

The Head of Corporate Information Management is responsible for ensuring that the software and/or procedures deployed by the Library to manage its register of hard-copy Registered Records satisfy the criteria listed above.

A registration system should be responsive to changing business needs, but any changes to the system should not have any impact on the metadata of the records registered in the system. If the metadata of records is transferred between registers or registration systems, the transfer should be carried out in such a way that does not adversely affect the metadata of the records and captures the event of transfer as process metadata.

The registration system should be managed in compliance with all requirements arising from analysis of current business, the regulatory environment and community expectations in which the Library operates. CIMU staff updating the register should understand how these requirements affect the business actions they perform. Compliance with such requirements should be regularly assessed and the records of these assessments retained for evidential purposes.

5.15.2 Record Registration & Storage System Characteristics (Electronic)

Line Managers (or the relevant Business Owners of a System as recorded in the Library's Systems Register) must consult with the Records Managers before purchasing, modifying or installing any electronic System or software that will maintain a store of electronic Records.

A System's Business Owner (with assistance from CIMU as required) is responsible for ensuring that any electronic System or software that maintains a store of electronic Records is suitable to meet the demands of the Library's operational and regulatory environment.

Systems storing electronic records should be managed in compliance with all requirements arising from analysis of current business, the regulatory environment and community expectations in which the Library operates. All staff creating and storing electronic Records should understand how these requirements affect the business actions they perform.

5.16 Documentation

The British Library intends to maintain adequate documentation of its Records Management processes in order to meet all legal, technical and organisational requirements.

The Library needs to have readily available evidence of its understanding of the nature of its own records, evidence of its care and security arrangements for the Records, and evidence of its business processes and their proper implementation. The Records Managers should be readily able to demonstrate the Library's continued compliance with legislation, policy, principles, processes and procedures over time, especially for periods beyond the term of employment of the current staff.

The Records Managers shall be responsible for the creation and maintenance of the relevant documentation in relation to the Library's Records. Such documentation should form a complete guide to the Library's Records Management policy, procedures and processes for each individual business unit. This may include this Manual, the Library's Records Management policy, detailed descriptions of business processes and the Registered Records that should result from them, current classification and metadata schema, departmental or directorate retention schedules, disposition registers, system specifications and manuals, monitoring reports, performance statistics, training records, audit assessments and any other relevant information.

5.17 Monitoring and Evaluation

The British Library intends to regularly monitor its Records Management Policy to ensure that it complies with all requirements of the regulatory environment, and to regularly assess its Records Management processes and procedures to ensure that they comply with the Library's own stated Policy.

Any monitoring and evaluation activities devised should be planned and systematic, and conducted using pre-defined methods and evaluation criteria. Records should be kept of monitoring and evaluation activities.

Records Systems should be monitored and evaluated regularly to ensure compliance with the Library's standards, to ensure that Registered Records will be accepted as evidence in a court of law if required, and to improve the Library's performance. The main objective however is to ensure that the Policy is not ignored in the press of business. Systematic monitoring helps to ensure continued legal accountability of the Records System, and should be documented to provide evidence of compliance. This includes systems provided by third parties, where contractual requirements relating to the management of records should be used as evaluation criteria.

Such compliance reviews should also examine whether the processes and procedures implemented are meeting the anticipated outcomes in terms of System performance, user satisfaction and cost effectiveness. Modifications should be made to the processes or procedures if these are found to be unsuitable or ineffective.

The Records Managers are responsible for routinely monitoring all aspects of the Library's Records Management, and for either making changes where required or escalating issues to the Corporate Information Governance Group. .

Internal Audit are responsible for conducting regular independent audits of compliance with the Records Management Policy. Should the Library become involved in litigation or come under regulatory scrutiny these independent reports will help establish that the Library has a reasonable Records Management Policy consistently enforced for legitimate business purposes.

Where possible, an approach of continuous improvement should be applied to the management of the Library's records.

5.18   Competence and Training

The British Library intends to provide adequate and ongoing training in its Records Management processes and procedures for all members of staff who create or use its Records, as required, in order to ensure competency in the management of records.

All staff should have access to the Records Management Policy and its implementation guidance, and periodically receive training on how it should be applied. The Records Managers are responsible for ensuring that adequate guidance is available to all staff via the corporate Intranet or other means as may be appropriate. The Records Managers shall be responsible for providing specific additional training in the Library's Records Management policy, systems, processes and procedures upon request.

Training programs should be devised based on an assessment of the competency (including knowledge and skills) of staff to manage the Library's records. Training should seek to address identified areas for improvement.

Each Line Manager must ensure that adequate training in the creation and management of Records is provided to the members of staff for which they are responsible, paying particular attention to the needs of new team members.

The competency of CIMU staff to manage records must also be assured through the provision of relevant professional-level training and development opportunities.