

Summary:

Records are a vital asset of the council. It is essential that records in digital formats should remain usable, locatable, and demonstrably authentic and free from illicit alterations throughout the period that the council is obliged or wishes to retain them. The council will therefore create and sustain administrative systems to ensure this is the case, acquiring appropriate IT applications to do so.

ID	
Last Review Date	February 2021
Next Review Date	October 2023
Approval	City Solicitor
Policy Owner	City Solicitor
Policy Author	Records Manager
Advice & Guidance	Records Manager, IT Business Partner, Corporate Information Governance Officer
Location	PolicyHub
Related Documents	PCC policies, legislation, regulations for particular areas of activity
Applicability	All councillors, council staff, volunteers and contractors in the course of council business

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1 Introduction

Portsmouth City Council, on behalf of the citizens it represents, holds a large amount of information. This information relates to individuals and places in the city as well as records of decisions made by the council, the reasons for these decisions and the actions it took. The council recognises that its records are an important public asset, vital to operating effectively, policy-making, defending citizens' rights and maintaining an historical record as a corporate memory.

In addition the council is bound to keep good records by legislation, statutory instruments and codes, such as the local government acts, EU General Data Protection Regulation 2016/679 (GDPR) and the Data Protection Act 2018 (DPA), The Freedom of Information Act 2000, The Environmental Information Regulations 2004, The Local Government Transparency Code 2015 and by regulating bodies overseeing particular aspects of its activities, such as the Care Quality Commission.

The council has decided it will keep some of its records permanently, as an historic record (council minutes, for example). Others it is required to keep for 75 or 100 years and some for unpredictably long periods (records of looked-after children and adoptions, records of building construction including presence of asbestos and property deeds).

Unless the council applies digital preservation procedures to its electronic files, however, they will not be usable for more than a couple of decades.

- Digital files and storage media are prone to sudden catastrophic deterioration which may render an individual file unreadable - the bitstream of a digital file is very vulnerable.

- Software programs may be replaced with different ones, while new generations of hardware and software may make files created earlier impossible to access.
- Reorganisation of council structures and staff turnover will leave records 'orphaned' and their locations, and perhaps very existence, unknown. The council could then be in breach of freedom of information legislation.
- Disposal may not take place when due, leaving the council in breach of data protection legislation.
- If storage of digital records is uncontrolled then their integrity as legal evidence may be successfully challenged.

The council's solution is to hold centrally digital records with long retention periods, with one team which will retrieve them for users on demand, while applying good practice in digital preservation to ensure that they are secure from interference, accessible despite technological change and, when necessary, destroyed at the end of their retention period. This is a similar solution to that adopted for paper records.

2 Purpose

This policy is to make clear Portsmouth City Council's commitment to ensure that records in digital formats of its activities remain locatable, usable and demonstrably authentic for the period that the council is legally obliged or wishes to retain them. It lays down the principles by which council officers will manage them effectively. Such records will allow it to:

- Make better decisions
- Defend the rights of the city's inhabitants
- Be held accountable for the actions of council and staff
- Carry out council business more effectively and efficiently
- Meet legal and regulatory requirements

Without such records the council's ability to fulfill its obligations may be catastrophically undermined.

3 Scope

This policy covers all records in any electronic format made or kept by all councillors, council staff, volunteers and contractors in the course of council business as a record of that business.¹ They include both born-digital records and records in other media which have been digitised for storage, preservation or access. It does not cover documents not required as a record, or information published by other organisations or individuals, except where they are kept as an historical record by the city's cultural services.

¹ For a definition of a record see Definitions, below.

4 Statement of Policy

Portsmouth City Council will create and maintain a digital repository or archive in which records which it is legally obliged or wishes to keep for lengthy periods (of 10 years or more) will be managed. This repository will allow the records to be

- located when they are needed,
- usable when they are needed by the application of digital preservation techniques
- demonstrably authentic and of strong integrity so they retain their evidential value
- disposed of in timely and appropriate fashion at the end of their retention periods

The council will provide

- appropriate software for these purposes and so that digital preservation techniques can be applied to the records
- staff with appropriate training to operate the repository

It is the responsibility of *all* members of the council, *all* council staff *and* volunteers, *and* companies or persons providing services or undertaking contracts on behalf of Portsmouth City Council, to, when undertaking council business:

- ensure that records they create which need to be kept for prolonged periods are identified as such and that the corporate retention schedule contains appropriate entries about them
- create appropriate metadata to aid retrieval of these records
- ensure that records which need to be kept for more than 10 years are transferred to the digital repository for safekeeping, with their metadata
- create new types of records and ICT systems only after consulting records management or information governance staff so the digital preservation of the records can be planned at their inception.

Managers at all levels have particular responsibility to ensure their section's records are managed in accordance with this policy and the Records Management Policy.

The council will also ensure that vital digital records are protected to enable it to function and recover swiftly after a disaster. Business continuity plans and procedures will be in place to guide rapid recovery.

5 Definitions

Authenticity Freedom from tampering or alteration, malicious or otherwise

Bitstream the series of 0s and 1s of which every digital file is made up

Born-digital records Records which were created using digital technology, such as a word-processor or digital camera, as opposed to records 'made-digital', such as a paper letter which has been scanned or photographed

Digital preservation	The series of actions needed to ensure a digital file remains readable despite changes in technology and file format obsolescence, and to prove that its content is unaltered
Digital repository	A technical system for managing, storing, and preserving digital files over a long period
Disposal	The process of deciding and implementing the fate of records that are no longer required for normal business purposes. It will involve either transfer to the Portsmouth History Centre to become part of the city's historical archive or destruction
Metadata	Data about data, or information that describes the digital file, such as file type, subject, creator, dates of creation and amendment, etc. Preservation metadata records actions relating to the digital preservation of a file, including migration from one format to another, fixity, etc
Records	Records are "information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business". ² They may be in any format, including electronic or printed documents, audio or video recordings, photographs or handwritten notes of telephone conversations and messages.
Retention period	The length of time for which the council is legally obliged or decides for other reasons to keep a record. Retention periods for different types of record are recorded in the council's corporate retention schedule.

6 Monitoring Compliance

Compliance will be monitored by the council's Library & Archive Services Manager, Records Manager and Corporate Information Governance Officer.

7 Related Policies

- Adult Social Care policies
- Anti-Fraud, Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Asbestos Management Policy
- Children's Services policies
- Data Protection Policy
- Financial Rules
- Gifts and Hospitality Policy
- Health & Safety Policies

² BS ISO 15489-1:2001 Information and documentation – Records management – Part 1: General.

- Induction Policy
- IT Policies
- Performance Development Review Policy
- Records Management Policy
- Regulation of Investigatory Powers Policy
- Sharing Data Policy
- Whistle Blowing Policy

The Portsmouth City Council retention schedule can be found on the PCC website at: [Link to retention schedule](#)

8 Policy Review

This policy will be reviewed in October 2023 and, thereafter, every three years.