



## Information and Records Management Policy

Issue date: 1 April 2010

Effective: 1 April 2010

This supersedes any previous policy.

### Purpose

1. The objective of this policy is to establish a framework for the creation, management, storage and disposal of all Information and Records, irrespective of format or medium, owned or held by Transport for London (TfL).
2. The policy covers all Information and Records created or acquired to support TfL's business activities.
3. External service providers must adhere to the principles of this policy; compliance will be monitored through contractual arrangements and audits.

### Definitions

4. Archives: an accumulation of records which has been appraised as having continuing historical and business value and is therefore retained permanently.
5. Information: any information, data or records, irrespective of format or medium, which are generated or used by a business system or process. Examples include electronic communications, emails, video recordings, hard copy (paper) files, images, graphics, maps, plans, technical drawings, programs, software and all other types of data.
6. Information Governance: a business unit within General Counsel.
7. Information Management: a business unit within Finance.
8. Information Owners: senior managers, who are responsible for managing the acquisition, creation, maintenance and disposal of TfL's Information and Information Systems within their assigned area of control.
8. Information Risk: that part of TfL's overall risk portfolio which relates to the, integrity, availability and confidentiality of Information.
9. Information System: Information in all media, hardware, software and supporting networks and the processes and human resources that support its acquisition, storage and communication.
10. Internal Audit: a business unit within General Counsel.
11. Records: information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business.

12. Records Disposal: the process of either destroying records at a specified time or designating their permanent retention as part of the corporate memory.
13. Records Disposal Schedule: a set of instructions allocated to a class of records to determine the length of time for which the records should be retained by the organisation for business purposes and their appropriate disposal.
14. Records Management: the field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.
15. Semi-current Records: Records no longer in active use which may be transferred to an external storage provider or lower tier electronic storage pending disposal.
16. Transport for London (TfL): the statutory corporation, Transport Trading Limited and its operational subsidiaries.
17. TfL Personnel: includes all TfL employees as well as all temporary staff, contractors, consultants and any third parties with whom special arrangements (such as confidentiality and non-disclosure agreements) have been made.

### **Organisational scope**

18. This policy applies to TfL and to any commercial organisations or service providers (including agencies or consultancy companies) contracted to carry out work for TfL.

### **Policy statement**

19. All information and records created or acquired by TfL in the course of its business activities, or on its behalf, are the property of TfL unless otherwise specified. This includes Information held in non-TfL email accounts used by TfL Personnel during the performance of activities covered by their contract of employment (or a relevant contract for services).
20. TfL recognises that its information and records are corporate assets which are necessary for delivery of the Mayor's Transport Strategy, good corporate governance, accountability and compliance with legal requirements. They also have value as evidence of decisions and actions and may be an important source of administrative, evidential and historical information.
21. TfL also understands that the management of information and records according to best practice will deliver the following business benefits:
  - (a) Improved information security;
  - (b) Better use of physical and server space;
  - (c) Better use of staff time;

- (d) Improved control and faster retrieval of valuable information resources; and
  - (e) Reduced costs.
22. TfL will adhere to the principles laid out in the following standards in order to support its compliance with the Data Protection Act 1998 and the Freedom of Information Act 2000:
- (a) Lord Chancellor's Code of Practice on Records Management;
  - (b) ISO15489:2001 International Standard on Records Management;
  - (c) BSI 10008:2008 Legal admissibility and evidential weight of information stored electronically; and
  - (d) The National Archives' standards on electronic records management.
  - (e) TfL's suite of Information Governance Policies.
23. TfL will comply with all other relevant legislation, including legislative requirements for record keeping in the areas of health and safety and taxation that may be relevant to the proper management of TfL's Information and Records.

### **Policy content**

24. TfL's policy is to ensure that:
- (a) Authentic, reliable and usable records are maintained to support the continuing conduct of business, comply with the regulatory environment, and provide necessary accountability. The integrity of these Records will be protected for as long as required, and they will be disposed of appropriately
  - (b) Information about TfL's activities is held in appropriate and readily accessible repositories;
  - (c) Any emails relating to TfL business, sent by TfL Personnel from non-TfL email accounts, are copied to a TfL email address to ensure they can be retained or accessed as necessary;
  - (d) Any business areas planning to implement or upgrade Electronic Document and Records Management (EDRM) or Electronic Content Management (ECM) solutions, use the 'TfL Enterprise EDRMS Framework Agreement' developed by Information Governance, Information Management and TfL's Commercial function;
  - (e) Information and Records not required for a specific legal, business, operational or historical purpose will be disposed of promptly and in an efficient manner, in accordance with corporate records disposal schedules;
  - (f) The management of Information and Records is recognised as a specific corporate responsibility, with the necessary levels of organisational support to ensure its effectiveness; and

- (g) Information Risk will be considered and afforded a priority in decisions within TfL in the same way as financial and operational risk. This will be reflected in corporate and local risk registers. Information Risk will be managed by a process of identifying, controlling, minimising and/or eliminating risks that may affect TfL's Information or Information Systems.

### **Responsibility for the management of Information and Records**

- 25. All TfL personnel are responsible for keeping accurate and complete Records of their activities and disposing promptly and efficiently of Information and Records associated with their activities which are not required for a specific legal, business, operational or historical purpose.
- 26. Line managers and supervisors are responsible for day to day management and monitoring of best practice in information and records management within their business areas.
- 27. Information system administrators are responsible for ensuring that all system documentation is accurate, legible and available to TfL Personnel when required.
- 28. Cost Centre managers are responsible for authorising expenditure relating to Information and Records management.
- 29. Information Owners are responsible for the application of the Information and Records Management Policy and for implementing its related TfL Standards and guidelines.
- 30. Information Management is responsible for:
  - (a) Advising TfL business units on the technical measures required to implement this policy and for their implementation on TfL's Information Systems; and
  - (b) Ensuring that appropriate technical measures are in place to support the management, retention and disposal of electronic Information.
- 31. Information Governance is responsible for:
  - (a) Developing and managing the Information and Records Management Policy and related procedures, including corporate records disposal schedules; and
  - (b) Managing the TfL Corporate Archives and TfL Records Store (including TfL's contracts with the associated external service providers).

### **Procedures/Guidelines/Processes**

- 32. All information held by TfL must be managed in accordance with TfL's Privacy and Data Protection Policy, Information Security Policy, Information Access Policy and Corporate Archives Policy.

33. The policy will be supported by corporate best practice guidelines and TfL Standards, including:
  - (a) A corporate records disposal schedule and business unit-specific schedules as required;
  - (b) A records management 'toolkit' published on TfL's intranet site. This will include advice on best practice in managing email, business shares, documents, scanned material and paper files;
  - (c) An Information Security Classification Standard to safeguard sensitive and confidential records and facilitate information sharing both within TfL and with external partners and stakeholders;
  - (d) A TfL Standard on scanning for legal admissibility plus associated local procedures;
  - (e) Procedures for the transfer and retrieval of records from external storage;
  - (f) Guidance on the identification of records of permanent value and the use of the historical archives as a corporate resource; and
  - (g) A TfL records management system requirements standard.
34. Information Governance will co-ordinate the provision of training and will give ad hoc advice on request on the proper management of information and records.
35. TfL will have in place a corporate strategy for the management of information systems and for the long-term preservation of electronic records of value.
36. A network of records management stakeholders in departments across TfL will be maintained to ensure that information and records management procedures and processes are communicated and implemented in all directorates.
37. Internal Audit will perform a periodic audit of the information and records management processes, procedures and practices of TfL and its service providers to monitor compliance with this policy.

### **Approval and amendments**

38. This policy was originally approved at the meeting of the TfL Leadership Team on 22 March 2010.
39. A number of minor amendments to this Policy were approved at the meeting of the TfL Leadership Team on 2 May 2012.
40. This policy will be subject to periodic review as considered appropriate by General Counsel.

### **Policy owner**

41. TfL's General Counsel is the designated owner of this policy.