

BBC Records Management Policy

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Policy owner: Corporate Records Manager

Department: BBC Archives

Summary

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.

Audience: This policy applies to all BBC employees and also to individuals who work within the BBC.

Key points of this policy

1. All records and information created in the course of BBC work are the property of the BBC.
2. It is the duty of all BBC employees 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](#)
 - [Information Security Policies](#)
 - [Corporate Retention Schedule](#)
 - [Use of Collaboration Tools in the BBC](#)
4. This policy applies to 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.

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BBC Records Management Policy

1. Scope of this policy

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.

2. 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).

The characteristics of a record are defined in Appendix 1.

- 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, accurate and subject to an agreed retention schedule.
- Records should be held in a managed structured system that allows them to be found easily.
- Records management systems must be secure and protect records from unauthorised alteration or deletion.

These key principles are supported by standards and guidelines published by BBC Archives and Information Security.

3. 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 I section 7).

3.1 Corporate records management

- BBC Archives has an overall commitment and responsibility to manage the BBC’s corporate records and advises and supports departments in managing their records.
- Records management staff will provide a structure for records management best practice and professional advice. 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.

3.2 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.

3.3 All staff

- All BBC staff should be aware of the value of their records and take responsibility for the management of the information that they create or use.

4. 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 (supporting 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.

5. 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 the depositing department.

Vital and important records must not be stored on hard drives, or within shared folders or email folders or cloud based platforms. These are not suitable for long-term records management.

BBC Archives will provide advice about the storage of documents and records that are not held in central storage areas.

See the [Use of Collaboration Tools in the BBC](#) guidance for more information about suitable solutions for storing and sharing documents.

5.1 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.

Restricted data needs appropriate measures to ensure its security and should be marked with the appropriate security marking as set out in the Information Classification & Handling Standard.

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

- contract information;
- talent information;
- personal or sensitive personal data;
- confidential business information; and
- 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.

6. Retention

Records must be kept 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 has been written to help the BBC comply with the Data Protection and Freedom of Information Acts. It helps to ensure that records are not kept longer than necessary and provides justification for why records are no longer held.

The [Corporate Retention Schedule](#) is available online and is accessible to all staff.

7. Selection

Electronic and hard copy records are accepted for permanent retention 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.

8. Disposal

Records, including backups and copies, should be disposed of in a secure and timely manner in line with the Data Protection Act and the Corporate Retention Schedule.

Records that have been appraised by BBC Archives will be destroyed if;

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

BBC Archives will keep information about what has been destroyed and why.

9. Monitoring of compliance

The [Information Policy Compliance](#) 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.

Appendix I: Characteristics of a record

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, organizations should implement and document policies and procedures which control the creation, receipt, transmission, maintenance and disposition of records to ensure that records creators are authorized and identified and that records are protected against unauthorized 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 unauthorized 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 authorized to make them.

Any authorized 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.

Appendix 2: References to related legislation

Legislation	Useful links
Freedom of Information Act	https://intranet.gateway.bbc.co.uk/fo/workplace-and-information-rights/FOIA/ Pages/default.aspx
Data Protection Act (DPA)	https://intranet.gateway.bbc.co.uk/fo/workplace-and-information-rights/DPA/ Pages/default.aspx
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
Human Rights Act	http://www.legislation.gov.uk/ukpga/1998/42/contents
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