Documents and communications retention policy

Retention and disposition of documents and communications not subject to the SPCB records retention schedule
Introduction

The SPCB is no different to any other digital organisation, the volume and complexity of our information is increasing daily – documents, email, instant messages (IM) and so on. Managing this information effectively is essential to

- ensure we comply with legislative and business drivers that require us to manage the retention of information we hold
- reduce the risk of non-compliance or breaches in security by permanently deleting information we’re no longer required to retain in a secure and auditable manner
- help reduce the information overload staff will increasingly experience and help increase agility by ensuring only information that is required is retained

Measures are in place to manage records of our activities (*SPCB records retention schedule*). Remaining ephemeral documents and communications, not subject to the *SPCB records retention schedule*, are subject to this policy.

Purpose

The purpose of this policy is to ensure that SPCB staff have a defined and consistent approach to managing the retention of documents and communications not subject to the *SPCB records retention schedule*.

This policy defines how long documents and communications that do not form a record – that is, contain information created, received and maintained as evidence and as an asset by the SPCB in pursuit of legal obligations or in the transaction of business – are retained for prior disposition.

The retention periods of different information types are detailed in [Annex A](#).

Applying this policy to information will mean:

- we will not retain information beyond its period of usefulness
- we will reduce the risk of retaining information for too long, longer than we have a legal basis for processing it
- we will spend less time looking for our information
- the public will spend less time waiting for information
- the public will be given the right information
Scope

This policy applies to all documents and communications we (Scottish Parliament, SPCB and SCPA) create, receive and share, regardless of format and storage repository, not subject to the SPCB records retention schedule. All individuals employed directly by the SPCB, or on the basis of a contract for services, are responsible for applying this policy.

Documents and communications must be captured and managed in SPShare, the Scottish Parliament’s document and records management system, and other systems provided by the SPCB.

Policy objectives

SPCB staff are required to maintain appropriate records of their activities and ensure that these records are accessible and managed in SPShare in accordance with records management procedures and the SPCB records retention schedule. Staff are required to ensure that documents and communications covered by this policy, e.g. ephemeral information, are:

- captured and managed in a system or repository provided, and endorsed, by the SPCB
- retained only for the period of time detailed in this policy or, if longer term retention is required, should be declared as a record and managed in SPShare
- compliant with the Acceptable use of IT policy

Review

This policy will be reviewed every three years in conjunction with records management policy and retention schedule reviews. The next review will be no later than January 2020

Related documentation

RM-01 The SPCB records retention schedule
RM-02 The SPCB records management strategy
RM-03 The SPCB records management policy
RM-04 The SPCB records management procedures and guidance
Roles and responsibilities

All staff are responsible for keeping appropriate information concerning their role in the SPCB and for complying with policies and procedures.

Individuals

Each individual is responsible for the information they create and receive. Individuals are responsible and accountable for ensuring records of their activities are not subject to this policy. Records should be declared and managed in SPShare. Individuals are responsible for identifying information subject to this policy and ensuring that relevant retention rules are applied as necessary.

Teams/Office

Each team or office is responsible for ensuring that information owners apply this policy to documents and communications not subject to the SPCB records retention schedule.

SPShare site owners

SPShare site owners are expected to provide immediate support to colleagues in their office, to promote and champion the use of SPShare as a document and records management solution by acting as a champion of good practice and to provide an essential point of contact between the Information Manager and office staff.

Group and Office Heads

Group and Office Heads are responsible for supporting site owners and for the effective application of this policy. Group and Office Heads are responsible for ensuring their business areas declare records within SPShare to accurately record activities within their business areas and for applying this policy to documents and communications not declared as records.

Information Manager

The Information Manager is responsible for:

- providing document and records management good practice through policies, procedures and guidance which meet our needs
- maintaining and implementing the Records management plan to satisfy the Public Records (Scotland) Act 2011
Documents and communications retention policy

- ensuring all teams and individuals understand and can carry out their responsibilities
- ensuring SPShare is fit-for-purpose
- supporting the network of SPShare site owners
- managing the application of this policy to SPCB systems
- managing the SPShare records centre to ensure records are disposed of in accordance with the SPCB records retention schedule

Scottish Parliamentary Service senior management

Overall responsibility for records management and the implementation of associated policies, procedures and guidance lies with SPS senior management, making use of advice and assistance from Gordon Hobbs, the Information Manager as appropriate. Alan Balharrie, Head of the Digital Services Group, is the senior post-holder with overall responsibility for records management.

Scottish Parliamentary Corporate Body

The documents and communications produced or received by the Scottish Parliament, SPCB and SCPA during the course of business activities are owned by the SPCB although managed by individuals.

This policy does not apply to Members of the Scottish Parliament or their staff.
Annex A – retention rules for documents and communications

<table>
<thead>
<tr>
<th>Information type</th>
<th>Examples of current solutions caught by this heading.</th>
<th>Recommended retention period</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>Documents</td>
<td>SPShare</td>
<td>2 years + 1 (expired items) [business requirements]</td>
<td>Automated</td>
</tr>
<tr>
<td>Instant Messaging (IM)</td>
<td>Skype IM, Teams Chat, Document Chat, Slack</td>
<td>1 week [business requirements]</td>
<td>Automated</td>
</tr>
<tr>
<td>Chat forums</td>
<td>Teams Conversations, Yammer, SharePoint Newsfeeds, SharePoint Discussion Groups</td>
<td>1 year [business requirements]</td>
<td>Automated</td>
</tr>
<tr>
<td>Email</td>
<td>Office 365, Outlook</td>
<td>2 years + 1 year (deleted items) [business requirements]</td>
<td>Automated</td>
</tr>
</tbody>
</table>

Instant Messaging (IM)
IM is a text based instant messaging solution that allows users to communicate in real time. IM is used for 1:1 chats but can on occasion be used for meetings and broadcasts. Instant messaging is designed as a fast paced, real-time communication channel and messages are generally not revisited. Instant messaging should not be relied on for capturing records of our activities – email or other tools should be used in these circumstances.

Chat forums
Chat forums tend to be asynchronous, as not all participants are always online and discussions occur at a much slower pace. Visitors to a forum can log in hours or even days after a discussion has started and still catch up by reading previous posts. Chat forums should not be relied on for capturing records of our activities – email and documents should be used in these circumstances.

Email
Email is a formal communication tool utilised by SPCB staff to successfully carry out their duties. Staff should be mindful of this when composing email and should remain professional at all times. Email messages may be retained for the public record or published as a result of information legislation – emails should be composed with this in mind. Failure to use email communications professionally may lead to disciplinary action (please refer to the Acceptable use of IT policy).
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| **Mobile phone messenger Apps**   | SMS/MMS  
WhatsApp  
Messenger  
Google Hangouts  
Line                                                                 | 1 week [business requirements] | Manual        |
| Mobile messenger apps             | Mobile messenger apps are not an appropriate formal means of communicating with colleagues within and outwith the SPCB. They: |                              |              |
|                                   | • can be misinterpreted  
• are inappropriate for the purposes of record keeping and audit                                      |                              |              |
| Messenger apps should not be relied on for capturing records of our activities – information that needs to be retained for the public record should be transferred to a format (e.g. document) that can be recorded in SPShare. | | | |
| **Voicemail**                     | Mobile phones  
Landline phones                                                                                                        | 1 year [business requirements] | Manual        |
|                                  |                                                                                                                          |                              | Automated     |