

Individual Decision

The attached reports will be taken as
Individual Portfolio Member Decisions on:

Thursday, 9th May, 2013

Ref:	Title	Portfolio Members	Page No.
ID2664	Flood Investigation Policy	Councillor Pamela Bale	1 - 10
ID2642	Access to Information Policy Revision	Councillor Roger Croft	11 - 22
ID2643	Corporate Complaints Policy Revision	Councillor Roger Croft	23 - 36
ID2644	Records Management Policy Revision	Councillor Roger Croft	37 - 48



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Individual Executive Member Decision

Title of Report:	Flood Investigation Policy
Report to be considered by:	Individual Executive Member Decision
Date on which Decision is to be taken:	9 th May 2013
Forward Plan Ref:	ID2664

Purpose of Report: To agree a policy for investigating flooding incidents under section 19 of the Flood and Water Management Act 2010.

Recommended Action: That the policy in appendix A be approved.

Reason for decision to be taken: To comply with the Council's duties under the Flood and Water Management Act 2010.

Other options considered: None

Key background documentation: Duty to Investigate Flooding Incidents Policy Document.

Portfolio Member Details	
Name & Telephone No.:	Councillor Pamela Bale - Tel (0118) 9842980
E-mail Address:	pbale@westberks.gov.uk

Contact Officer Details	
Name:	Jon Winstanley
Job Title:	Projects Manager
Tel. No.:	01635 519 087
E-mail Address:	jwinstanley@westberks.gov.uk

Implications

Policy:	Approval of this report will formalise a Policy for the investigation of flood incidents.
Financial:	None
Personnel:	None
Legal/Procurement:	None
Property:	This policy is aimed at establishing a procedure for investigating flood incidents and recommending actions to prevent future property flooding.
Risk Management:	This duty aligns with the Council's duties to manage local flood risk as Lead Local Flood Authority under the Flood and Water Management Act 2010.

NOTE: Strategic Support is not able to accept your report without the following section being completed and an Equality Impact Assessment (EIA) being attached where required. For advice please visit www.westberks.gov.uk/eia or contact the Principal Policy Officer (Equality & Diversity) on Ext. 2441 or Team Leader/Solicitor - Corporate Team on Ext. 2626.

Is this item relevant to equality?	Please tick relevant boxes		Yes	No
Does the policy affect service users, employees or the wider community and:				
• Is it likely to affect people with particular protected characteristics differently?			<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Is it a major policy, significantly affecting how functions are delivered?			<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Will the policy have a significant impact on how other organisations operate in terms of equality?			<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Does the policy relate to functions that engagement has identified as being important to people with particular protected characteristics?			<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Does the policy relate to an area with known inequalities?			<input type="checkbox"/>	<input checked="" type="checkbox"/>
Outcome (Where one or more 'Yes' boxes are ticked, the item is relevant to equality)				
Relevant to equality - Complete an EIA available at www.westberks.gov.uk/eia			<input type="checkbox"/>	<input checked="" type="checkbox"/>
Not relevant to equality			<input checked="" type="checkbox"/>	<input type="checkbox"/>

Consultation Responses

Members:

Leader of Council:	Councillor Gordon Lundie has been consulted and has no objection to the proposal.
Overview & Scrutiny Management Commission Chairman:	Councillor Brian Bedwell is pleased to support this decision.
Ward Members:	N/A
Opposition	N/A

Spokesperson:

Local Stakeholders: Thames Water and the Environment Agency have been involved in the development of this policy.

Officers Consulted: Mark Edwards, Stuart Clark, Carolyn Richardson, Anop Gehlot, Jonathan Bowden, Antonia Bartzou.

Trade Union: N/A

Is this item subject to call-in?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
If not subject to call-in please put a cross in the appropriate box:		
The item is due to be referred to Council for final approval	<input type="checkbox"/>	
Delays in implementation could have serious financial implications for the Council	<input type="checkbox"/>	
Delays in implementation could compromise the Council's position	<input type="checkbox"/>	
Considered or reviewed by Overview and Scrutiny Management Commission or associated Task Groups within preceding six months	<input type="checkbox"/>	
Item is Urgent Key Decision	<input type="checkbox"/>	
Report is to note only	<input type="checkbox"/>	

Supporting Information

1. Background

- 1.1 Section 19 of the Flood and Water Management Act 2010 came into Law in April 2011. This places a duty on Lead Local Flood Authorities (LLFA) to investigate flood incidents where responsibility for the flooding is not immediately obvious or accepted. West Berkshire Council is the LLFA for this area.
- 1.2 A draft policy has been in place since April 2011. During the winter of 2012/13 this policy has been put to the test and a prominent flood investigation completed for the Pingewood area. Completion of this process has helped inform the policy and procedure which has led to a position where the policy can be formalised.

2. Duty to Investigate

- 2.1 The Policy gives comprehensive details of the threshold levels that would trigger an investigation, the purpose and scale of the investigation, the procedure and how the report will be published. The policy can be seen in Appendix A.

3. Equalities Impact Assessment Outcomes

- 3.1 Consultation has taken place with officers and with external partner flood risk management organisations. This is a District wide policy which will be used as part of the Council's overall aim of reducing and managing local flood risk. Flooding that places vulnerable groups at risk, where the consequences of such flooding could be more severe, will be investigated as part of this policy.

4. Conclusion

- 4.1 It is recommended that this Flood Investigation Policy be approved to formalise the procedure for investigating flood incidents and to comply with the Council's duties under the Flood and Water Management Act 2010.

Appendices

Appendix A – Section 19 – Duty to Investigate Flood Incidents Policy Document.

Appendix B – Formal notification to partner risk management authorities.

Appendix A

Section 19 - Duty to Investigate Flooding Incidents Policy Document

Created by: Jon Winstanley

Updated: April 2013

1. Background

1.1. The Flood and Water Management Act 2010 (the Act) places a duty on the Council, as the Lead Local Flood Authority for its area, to investigate flooding incidents that it becomes aware of, to the extent that it considers necessary or appropriate.

1.2. Section 19 of the Act states:

Local authorities: investigations

- (1) *On becoming aware of a flood in its area, a lead local flood authority must, to the extent that it considers it necessary or appropriate, investigate-*
 - (a) *which risk management authorities have relevant flood risk management functions, and*
 - (b) *whether each of those risk management authorities has exercised, or is proposing to exercise, those functions in response to the flood.*
- (2) *Where an authority carries out an investigation under subsection (1) it must-*
 - (a) *publish the results of its investigation, and*
 - (b) *notify any relevant risk management authorities'*

2. Threshold for Investigation

2.1. The Council will investigate all flooding incidents reported by the public, or that otherwise come to its attention, that involve:

- Internal flooding of habitable property, excluding garages and out buildings.
- Flooding that breaches or threatens the critical infrastructure e.g electricity sub stations and switching centres, A roads, railways, bridges, flood defences, water treatment works, pumping stations.
- Flooding that directly results in serious injury or death.
- Flooding that incurs a significant economic impact to businesses.

- Flooding that places vulnerable individuals or vulnerable communities at risk e.g. hospitals, care and nursing homes, schools, secure units etc.
 - Weight of public interest. The LLFA may consider a flood investigation necessary if deemed important enough by elected members. The weight of public interest should also be taken into consideration when determining if a flood investigation should be carried out.
- 2.2. The Council may also investigate smaller “near miss” flooding incidents, but will not publish the findings of such investigations in a public forum but will share with the professional partners.
- 2.3. The Council, as Highway Authority, will continue to investigate smaller scale flooding on the highway, but will not publish the findings of such investigations.

3. Purpose and Scale of Investigations

- 3.1. Any investigations undertaken will seek to establish the likely causes of the flooding incident, the relevant risk management authorities, and identify any recommended actions to be undertaken by the relevant risk management authorities in order to reduce the risk of a recurrence.
- 3.2. The investigations will be undertaken during, or as soon as possible after, the flooding incident, and will be appropriate to the scale and nature of the flooding incident.
- 3.3. Small scale flooding incidents, and incidents where the relevant risk management authorities are immediately apparent or are undertaking actions to alleviate the cause of the flooding incident, are likely to require limited investigations.
- 3.4. Large scale flooding incidents, incidents where the relevant flood risk management authorities are unclear, and incidents where a number of risk management authorities are involved, are likely to require more detailed investigations. In such circumstances the Council will work closely with the risk management authorities involved and may, where appropriate, prepare a detailed report.

4. Flood Investigation Procedure

Flood reported to the LLFA;

Flooding log started;

Flood investigator appointed;

Initial LLFA assessment undertaken as to whether this constitutes a section 19 report;

If yes, formal notification issued to partner risk management authorities notifying of the investigation and requesting any relevant information (see Appendix B for formal notification);

Flood investigation undertaken and report drafted in consultation with partner risk management authorities;

Draft report issued for comment;

Report and associated actions approved by Executive Councillor for Partnerships, The Visions, Communities, Emergency Planning;

Finalised report to be published on the Council's internet as below (section 5).

Where a number of flood investigations are needed simultaneously, investigations will be prioritised by the Projects Manager in consultation with the Executive Councillor.

5. Publication of Findings of Investigations

- 5.1 The findings of all investigations undertaken by the Council, as Lead Local Flood Authority, will be recorded on a spreadsheet (copy attached).
- 5.2 The spreadsheet, and any detailed reports relating to flooding incidents on the spreadsheet, will be published on the Council's website.

6. Risk management authorities

The principal flood risk management authorities are:

- The Environment Agency (Risk management authority – Flood and Water Management Act 2010)
- West Berkshire Council (Lead local flood authority – Flood and Water Management Act 2010)
- West Berkshire Council (Highway authority – Highways Act 1980)
- Thames Water Utilities Ltd. (Water company – Water Industry Act 1991)

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Date

Attach distribution list

Highways and Transport

Council Offices
Market Street, Newbury
Berkshire RG14 5LD

Our Ref: JWi

Your Ref:

Please ask for: Jon Winstanley

Direct Line: 01635 519087

Fax: 01635 519637

e-mail: jwinstanley@westberks.gov.uk

Dear ??

Notification of S19 LLFA Flood Investigation.

Location:

Date of Flooding Event:.....

I would like to inform you of West Berkshire Council's intention to undertake a flood investigation in accordance with section 19 of the Flood and Water Management Act 2010.

A formal flood investigation will be undertaken as *(insert reasons why threshold level for investigation exceeded along with a brief description of the incident. Refer to location plan if appropriate)*.

The flood investigating officer will be

Please provide the following details: *(delete as appropriate)*

- Details of any property flooding including details of type of property;
- Details of flood alerts/warnings issued;
- Sewerage flooding within properties within properties;
- Details of actions your agency undertook during this period in this area
- Details of your risk management duties in relation to this flooding;
- Any relevant information on past flooding incidents at this location.

In order to progress this investigation please send in your responses by

Please acknowledge receipt of the letter and if you require any further information please contact me on 01635 519087.

Yours sincerely

Jon Winstanley
Projects Manager

Distribution list for notification of S19 flood investigation.

Environment Agency

Jeanne Capey
Partnership and Strategic Overview Team Leader,
Kings Meadow House,
Kings Meadow Road,
Reading,
RG1 8DQ.

Thames Water

Mark Dickinson
Development Planning Manager
Maple Lodge
Maple Lodge Close
Maple Cross
WD3 9SQ

Canal & River Trust

If a cross boundary issue:

Reading Borough Council

Vaughan Norris

Wokingham Borough Council

Eddie Napper

Wiltshire

Oxfordshire

Hampshire

Other Agencies as appropriate eg

Highways Agency

Network Rail

Critical Infrastructure Owners

Land Owners

Individual Executive Member Decision

Title of Report:	Access to Information Policy Revision
Report to be considered by:	Individual Executive Member Decision
Date on which Decision is to be taken:	9 th May 2013
Forward Plan Ref:	ID2642

Purpose of Report: To present the revised Access to Information Policy for consideration by the Executive Member for Council Strategy & Performance, Housing, ICT, Corporate Support, Legal

Recommended Action: That the Executive Member for Council Strategy & Performance, Housing, ICT, Corporate Support, Legal approves the revised Access to Information Policy

Reason for decision to be taken: The Policy is subject to regular review, and has been revised to take account of procedural and statutory changes

Other options considered: N/A

Key background documentation: Freedom of Information Procedure; Data Protection Requests Procedure; Security Policy

Portfolio Member Details	
Name & Telephone No.:	Councillor Roger Croft - Tel (01635) 868638
E-mail Address:	rcroft@westberks.gov.uk

Contact Officer Details	
Name:	Sue Broughton
Job Title:	Information Management Officer
Tel. No.:	01635 519747
E-mail Address:	scbroughton@westberks.gov.uk

Implications

Policy:	This is a review and revision of an existing Policy
Financial:	None
Personnel:	None
Legal/Procurement:	None
Environmental:	None
Property:	None
Risk Management:	Access to Information falls within statutory legislation. There is a risk to the Council of enforcement by the Regulator (The Information Commissioner) if requests are not answered in a consistent and timely manner.
Equalities Impact Assessment:	As at Appendix A - no requirement to go to Stage 2.

Consultation Responses

Members:

Leader of Council:	Councillor Gordon Lundie
Overview & Scrutiny Management Commission Chairman:	Councillor Brian Bedwell
Ward Members:	N/a
Opposition Spokesperson:	Councillor Tony Vickers
Local Stakeholders:	Consultation with Local Stakeholders is not required for this item
Officers Consulted:	David Lowe, Directors & Heads of Service
Trade Union:	Rosemary Culmer

Is this item subject to call-in?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
If not subject to call-in please put a cross in the appropriate box:		
The item is due to be referred to Council for final approval		<input type="checkbox"/>
Delays in implementation could have serious financial implications for the Council		<input type="checkbox"/>
Delays in implementation could compromise the Council's position		<input type="checkbox"/>
Considered or reviewed by Overview and Scrutiny Management Commission or associated Task Groups within preceding six months		<input type="checkbox"/>
Item is Urgent Key Decision		<input type="checkbox"/>
Report is to note only		<input type="checkbox"/>

Supporting Information

1. Background

- 1.1 The Freedom of Information Act 2000, Environmental Information Regulations 2004 and Data Protection Act 1998 are the three statutory provisions which between them encompass public or individual access to information held by the authority.
- 1.2 The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 make provision for an individual or organisation to request general information from the authority. The information must be released unless a relevant exemption applies.
- 1.3 The Data Protection Act 1998 makes provision for an individual to request their own personal data from the authority. Again, the information must be released unless a relevant exemption applies. In addition the Data Protection Act 1998 sets out Principles for the appropriate and lawful processing of personal data, and sets out the statutory requirements for data security.
- 1.4 Failure to provide requested information in a consistent and timely fashion, or to protect personal data from misuse, is subject to investigation and enforcement action by the Regulator for these statutory regimes (The Information Commissioner). Consequently, the authority provides training and guidance to inform all staff of their statutory responsibilities.
- 1.5 Whilst none of these statutes contains a mandatory requirement for a Policy statement, a Policy statement is necessary to state the authority's intentions in respect of the legislation, and to outline to the residents and other stakeholders the Council's commitment to abide by the legislation. The previous Policy requires review and revision to ensure it complies with current practice.

2. Access to Information

- 2.1 While there is no recommendation or mandatory requirement for a Policy Statement in respect of the Freedom of Information Act 2000, the Environmental Information Regulations 2004 or the Data Protection Act 1998, the Council has a commitment to abide by the legislation.
- 2.2 The provision of a Policy statement is a formal recognition of this commitment. Procedural guidance is also published and will be updated in line with the Policy.

3. Equalities Impact Assessment Outcomes

- 3.1 The Policy makes specific provision for advice and assistance to be provided to those identified as vulnerable groups who may experience difficulties in making a request or understanding the information provided.

4. Conclusion

- 4.1 The Access to Information Policy has been revised in line with best practice and the recommendations of The Information Commissioner.

5. Recommendations

- 5.1 That the Executive Member for Council Strategy & Performance, Housing, ICT, Corporate Support, Legal approves the revised Access to Information Policy.

Appendices

Appendix A – Equality Impact Assessment – Stage 1
Appendix B – Access to Information Policy

Equality Impact Assessment – Stage One

Name of item being assessed:	Corporate Complaints Policy
Version and release date of item (if applicable):	Version 4 February 2013
Owner of item being assessed:	Sue Broughton
Name of assessor:	Sue Broughton
Date of assessment:	14 th February 2013

1. What are the main aims of the item?
To ensure the fair, consistent and equitable handling of corporate complaints

2. Note which groups may be affected by the item, consider how they may be affected and what sources of information have been used to determine this. (Please demonstrate consideration of all strands – age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation)

Group Affected	What might be the effect?	Information to support this.
Age	The Policy makes provision for those with vulnerabilities to access the Access to Information process	S 3.1.2 Advice and assistance shall be offered to help any enquirer frame their request. S3.1.6 Assistance shall be offered to any enquirer to help them understand the information they receive.
Disability	The Policy makes provision for those with vulnerabilities to access the Access to Information process	S 3.1.2 Advice and assistance shall be offered to help any enquirer frame their request. S3.1.6 Assistance shall be offered to any enquirer to help them understand the information they receive.
Race	The Policy makes provision for those with language barriers to access the Access to Information process	S 3.1.2 Advice and assistance shall be offered to help any enquirer frame their request. S3.1.6 Assistance shall be offered to any enquirer to help them understand the information they receive.

Other aspects	N/A	
Further comments relating to the item:		

3. Result (please tick by double-clicking on relevant box and click on 'checked')	
<input type="checkbox"/>	High Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input type="checkbox"/>	Medium Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input type="checkbox"/>	Low Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input checked="" type="checkbox"/>	No Relevance - This does not need to undergo a Stage 2 Equality Impact Assessment

For items requiring a Stage 2 equality impact assessment, begin the planning of this now, referring to the equality impact assessment guidance and Stage 2 template.

4. Identify next steps as appropriate:	
Stage Two required	
Owner of Stage Two assessment:	
Timescale for Stage Two assessment:	
Stage Two not required:	

Name: Sue Broughton

Date: 14th February

Access to Information Policy

Document Control

Document Ref:	WBC:SS:SCB:0812AtI	Date Created:	February 2013
Version:	Replaces Access to Information Policy V1 approved 2007	Date Modified:	
Revision due	February 2015		
Author:	Susan Broughton	Sign & Date:	
Owning Service	Strategic Support		
Equality Impact Assessment: (EIA)	Date undertaken:		
	Issues (if any):		

Corporate Director (Resources Directorate)	Sign & Date:	
Corporate Director (Communities Directorate)	Sign & Date:	
Corporate Director (Environment Directorate)	Sign & Date:	

Change History

Version	Date	Description	Change ID
1	2007	Access to Information Policy	
2	2011	Access to Information Policy	
3			

Contents

1. Purpose	3
2. Applicability	3
3. Policy	3
4. Implementation	4
5. Roles and Responsibilities	5
6. Failure to comply with the Access to Information Policy	5
7. Review	5
Glossary	6
Other Relevant Documentation	6

1. Purpose

- 1.1 The purpose of this policy is to ensure that West Berkshire Council complies with the requirements of the existing access to information legislation, including the Data Protection Act 1998, the Freedom of Information Act 2000, the Environmental Information Regulations 2004, and the Local Government Act 1972 Schedule 12A, and with any subsequent legislation.
- 1.2 The Access to Information Policy has been approved by Individual Executive Member Decision on [date].
- 1.3 This Policy applies to all requests for information made to West Berkshire Council, whether written or verbal, and to the security, confidentiality and administration of all personal information.

2. Applicability

- 2.1 This Policy applies to:
 - 2.1.1 All non-school based employees working for the Council, including those working from home or at non-Council locations.
 - 2.1.2 Other persons including Elected Members, Consultants, Agency staff and Contractors working for the Council, external organisations working with the Council, whilst engaged on Council business .
- 2.2 It is the responsibility of each employee and other person mentioned in Section 2.1.2 to familiarise themselves with and adhere to this Policy.
- 2.3 Adherence to this Policy is a condition of working for the council or using its assets.
- 2.4 This document is published separately on the Council's website www.westberks.gov.uk/informationmanagement
- 2.5 This Policy has had consultation with Heads of Service and Trade Unions and has been ratified by Individual Executive Member Decision.

3. Policy

- 3.1 It is the Policy of the Council to ensure that:
 - 3.1.1 All requests for information are acknowledged and dealt with promptly, and within the statutory timescales.
 - 3.1.2 Advice and assistance shall be offered to help any enquirer frame their request.
 - 3.1.3 Requests will be assessed to ensure that where applicable; the confidentiality of personal or commercially sensitive information is not breached; disclosure is in the public interest; and provision of the information would not be prejudicial to the provision of essential Council services.

- 3.1.4 Information shall only be withheld where a legitimate exemption applies, and in such a case, (where appropriate) the application of the exemption will be explained to the enquirer.
 - 3.1.5 Any enquirer shall be kept informed of the progress of their request, and of any delays to which it may be subject.
 - 3.1.6 Assistance shall be offered to any enquirer to help them understand the information they receive.
 - 3.1.7 All enquirers shall be advised of their rights to question the information received and request a review of what has not been provided.
 - 3.1.8 All enquirers shall be advised of their right to take any complaint to an internal review process (where appropriate) or to the Information Commissioner, if they are dissatisfied with the service received or the information provided.
 - 3.1.9 Information which can be made publicly available shall be published under the provisions of the Publication Scheme to the West Berkshire Council website, or, where provided in response to a request, shall be published to the Council's Disclosure Log.
 - 3.1.10 All requests shall be monitored and performance indicators made available to demonstrate compliance with the legislation.
 - 3.1.11 All staff shall be provided with training, guidance and procedures to enable them to manage requests for information.
 - 3.1.12 Guidance will be provided for Members to enable them to identify, and respond to, or pass on to the public authority, requests made by their constituents.
- 3.2 Personal information, sensitive personal information and confidential information shall be stored, updated, transferred and protected as required by law, and as required for personal privacy, commercial sensitivity, and corporate security.
- 3.3 An officer or officers shall be appointed with specific responsibility for the administration of all requests for information made under the legislation cited in 1.1 (above).
- 3.4 The management of the access to information and Data Protection regimes shall be regularly audited to ensure compliance with statutory requirements and that relevant national codes of practice are followed.
4. **Implementation**
- 4.1 This Policy will be supported and implemented by the development and publication of Standards (requirements), Procedures (how to) and Guidance (advice) where required.

5. **Roles and Responsibilities**

- 5.1 The overall responsibility for access to information and Data Protection within the Council rests with the Chief Executive.
- 5.2 The responsibility for day-to-day management of access to information throughout West Berkshire Council rests with the Head of Strategic Support, who is also responsible for maintaining this Policy, for reviewing related procedures and for providing advice and guidance on their implementation.
- 5.3 All managers are directly responsible for implementing this Policy and any sub policies and procedures within their service areas, and for the adherence of their staff and others (2.1.2).
- 5.4 All personnel detailed at 2.1.1 and 2.1.2 have an individual responsibility to adhere to this Policy and any relevant Standards and/or Procedures.

6. **Failure to comply with the Access to Information Policy**

- 6.1 This document provides staff and others with essential information regarding access to information and sets out conditions to be followed. It is the responsibility of all to whom this Policy document applies to adhere to these conditions. Failure to do so may result in:
- withdrawal of access to relevant services
 - informal disciplinary processes
 - formal disciplinary action (in accordance with the Disciplinary Procedure)
- 6.2 Additionally if, after internal investigation, a criminal offence is suspected (for example under the Data Protection Act 1998), the Council may contact the police or other appropriate enforcement authority to investigate whether a criminal offence has been committed.

7. **Review**

- 7.1 This policy will be reviewed to respond to any changes and at least every 2 years.
- 7.2 The Service responsible for reviewing and maintaining this Policy is Strategic Support.

Glossary

Data Protection Act 1998 – An Act to make new provision for the regulation of the processing of information relating to individuals, including the obtaining, holding use or disclosure of such information.

Freedom of Information Act 2000 – An Act to make provision for the disclosure of information held by public authorities or by persons providing services for them and to amend the Data Protection Act 1998 and the Public Records act 1958; and for connected purposes.

Other Relevant Documentation

Freedom of Information Act and Environmental Information Regulations Requests Procedures (in revision)

Data Protection Act Requests Procedures (in revision)

Security Policy

Standard - Protective Marking

Secure (Encrypted) Email Guidance

Agenda Item 3.

Individual Executive Member Decision

Title of Report:	Corporate Complaints Policy Revision
Report to be considered by:	Individual Executive Member Decision
Date on which Decision is to be taken:	9 th May 2013
Forward Plan Ref:	ID2643

Purpose of Report: To present the revised Corporate Complaints Policy for consideration by the Executive Member for Council Strategy & Performance, Housing, ICT, Corporate Support, Legal.

Recommended Action: That the Executive Member for Council Strategy & Performance, Housing, ICT, Corporate Support, Legal approves the revised Corporate Complaints Policy.

Reason for decision to be taken: The Policy is subject to regular review, and has been revised to take account of procedural changes

Other options considered: N/A

Key background documentation: Corporate Complaints Procedure; Persistent & Prolific Complaints Procedure

Portfolio Member Details	
Name & Telephone No.:	Councillor Roger Croft - Tel (01635) 868638
E-mail Address:	rcroft@westberks.gov.uk

Contact Officer Details	
Name:	Sue Broughton
Job Title:	Information Management Officer
Tel. No.:	01635 519747
E-mail Address:	scbroughton@westberks.gov.uk

Implications

Policy:	There is a Constitutional requirement for a Corporate Complaints Policy
Financial:	None
Personnel:	None
Legal/Procurement:	None
Environmental:	None
Property:	None
Risk Management:	Adverse risk if the Council does not have a Corporate Complaints Policy and Procedure
Equalities Impact Assessment:	Attached

Consultation Responses

Members:

Leader of Council:	Councillor Gordon Lundie
Overview & Scrutiny Management Commission Chairman:	Councillor Brian Bedwell
Ward Members:	N/a
Opposition Spokesperson:	Councillor Tony Vickers
Local Stakeholders:	Hilary Cole; Tony Vickers
Officers Consulted:	Andy Day; David Lowe; Heads of Service; Directors
Trade Union:	Rosemary Culmer

Is this item subject to call-in?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
If not subject to call-in please put a cross in the appropriate box:		
The item is due to be referred to Council for final approval		<input type="checkbox"/>
Delays in implementation could have serious financial implications for the Council		<input type="checkbox"/>
Delays in implementation could compromise the Council's position		<input type="checkbox"/>
Considered or reviewed by Overview and Scrutiny Management Commission or associated Task Groups within preceding six months		<input type="checkbox"/>
Item is Urgent Key Decision		<input type="checkbox"/>
Report is to note only		<input type="checkbox"/>

Supporting Information

1. Background

- 1.1 The Local Government Act 2000 introduced a requirement for councils to produce a Constitution which sets out how the Council operates, how decisions are made and the procedures which are to be followed to ensure that these decisions are efficient, transparent and accountable to local stakeholders.
- 1.2 West Berkshire Council has produced a Constitution which sets out (Part 13:3) how members of the public can make a complaint:-
 - a) to the Council itself under its Customer Comments and Complaints Procedure;
 - b) to the Local Government Ombudsman after using the Council's own Customer Comments and Complaints Procedure;
 - c) to the Standards Committee about any breach of the Members' Code of Conduct.
- 1.3 A Complaints Policy is not a mandatory or statutory requirement, but is a best practice provision. The current Complaints Policy was written in 2008, since that date there have been procedural changes, and the Policy is overdue for review and revision.
- 1.4 A recent Audit of the Corporate Complaints Process by the Internal Audit Service identified that the Procedure and Policy were overdue for revision.

2. Corporate Complaints Policy

- 2.1 The Policy sets out the stated requirements for complaints handling also detailed in the Constitution. Its purpose is to assist staff in understanding their responsibilities in respect of complaints from members of the public, organisations and other complainants regarding services provided by or actions taken by the Council. It is also intended to explain to the wider public the way in which complaints will be handled within the Council. It is a public document

3. Equalities Impact Assessment Outcomes

- 3.1 The Policy makes specific provision for advice and assistance to be provided to those identified as vulnerable groups who may experience difficulties raising a complaint. This is detailed in the attached Stage One review. There is no requirement for a Stage Two review.

4. Conclusion

- 4.1 The Corporate Complaints Policy has been revised in accordance with best practice, Local Government Ombudsman recommendations and the recommendations of the Corporate Complaints Audit.

5. Recommendations

- 5.1 That the Executive Member for Council Strategy & Performance, Housing, ICT, Corporate Support, Legal approves the revised Corporate Complaints Policy.

Appendices

Appendix A – Equality Impact Assessment – Stage 1
Appendix B – Corporate Complaints Policy (revised)

Equality Impact Assessment – Stage One

Name of item being assessed:	Corporate Complaints Policy
Version and release date of item (if applicable):	Version 4 February 2013
Owner of item being assessed:	Sue Broughton
Name of assessor:	Sue Broughton
Date of assessment:	14 th February 2013

1. What are the main aims of the item?
To ensure the fair, consistent and equitable handling of corporate complaints

2. Note which groups may be affected by the item, consider how they may be affected and what sources of information have been used to determine this. (Please demonstrate consideration of all strands – age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation)

Group Affected	What might be the effect?	Information to support this.
Age	The Policy makes provision for those with vulnerabilities to access the complaints process	S 3.1.3 Advice and assistance shall be offered to help any enquirer frame their complaint. Complaints may be accepted verbally or resolved verbally where a written complaint or written response cannot be provided, for whatever reason.
Disability	The Policy makes provision for those with vulnerabilities to access the complaints process	S 3.1.3 Advice and assistance shall be offered to help any enquirer frame their complaint. Complaints may be accepted verbally or resolved verbally where a written complaint or written response cannot be provided, for whatever reason.
Race	The Policy makes provision for those with language barriers to access the complaints process	S 3.1.3 Advice and assistance shall be offered to help any enquirer frame their complaint. Complaints may be accepted verbally or resolved verbally where a written complaint or written response cannot be provided, for whatever reason.

Other aspects	N/A	
Further comments relating to the item:		

3. Result (please tick by double-clicking on relevant box and click on 'checked')	
<input type="checkbox"/>	High Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input type="checkbox"/>	Medium Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input type="checkbox"/>	Low Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input checked="" type="checkbox"/>	No Relevance - This does not need to undergo a Stage 2 Equality Impact Assessment

For items requiring a Stage 2 equality impact assessment, begin the planning of this now, referring to the equality impact assessment guidance and Stage 2 template.

4. Identify next steps as appropriate:	
Stage Two required	
Owner of Stage Two assessment:	
Timescale for Stage Two assessment:	
Stage Two not required:	Stage Two not required

Name: Sue Broughton

Date: 14th February

Corporate Complaints Policy

Document Control

Document Ref:	WBC:SS:SCB:0812CC	Date Created:	February 2013
Version:	V4	Date Modified:	
Revision due	February 2015		
Author:	Sue Broughton	Sign & Date:	
Owning Service	Strategic Support		
Equality Impact Assessment: (EIA)	Date undertaken:		
	Issues (if any):		

Corporate Director (Resources Directorate)	Sign & Date:	
Corporate Director (Communities Directorate)	Sign & Date:	
Corporate Director (Environment Directorate)	Sign & Date:	

Change History

Version	Date	Description	Change ID
1		Corporate Complaints and Comments Procedure V1 2002	
2		Corporate Complaints and Comments Procedure V2 2005	
3		Corporate Complaints Policy V3 2008	WBC/P&C/SCB/05 08/Policy



Contents

1.	Purpose.....	3
2.	Applicability	3
3.	Policy.....	3
4.	Implementation.....	5
5.	Roles and Responsibilities	5
6.	Failure to comply with WBC Corporate Complaints Policy	5
7.	Review	6
	Glossary.....	7
	Other Relevant Documentation.....	7

1. Purpose

- 1.1 The purpose of this policy is to assist staff in understanding their responsibilities in respect of complaints from members of the public, organisations and other complainants regarding services provided by or actions taken by the Council.
- 1.2 This policy applies to corporate complaints made to West Berkshire District Council whether written or verbal, but excludes complaints regarding social care or complaints made to schools for which other policies exist. Officers wishing to make a complaint about the Council should refer to the Grievance Procedure and the Whistleblowing Policy.
- 1.3 The Corporate Complaints Policy has been approved by Individual Executive Member Decision on [date].

2. Applicability

- 2.1 This Policy applies to:
 - 2.1.1 All non-school based employees working for the Council, including those working from home or at non-Council locations.
 - 2.1.2 Other persons including Elected Members, Consultants, Agency staff and Contractors working for the Council, external organisations working with the Council, whilst engaged on Council business .
- 2.2 It is the responsibility of each employee and other person mentioned in Section 2.1.2 to familiarise themselves with and adhere to this Policy.
- 2.3 Adherence to this Policy is a condition of working for the council or using its assets.
- 2.4 This document is published separately on the Council's website www.westberks.gov.uk/complaints .
- 2.5 This Policy has had consultation with Heads of Service and Trade Unions and has been ratified by Individual Executive Member Decision.

3. Policy

- 3.1 It is the Policy of the Council to ensure that:
 - 3.1.1 All complaints shall be dealt with promptly, and where possible within the published timescales in 3.2.
 - 3.1.2 All complaints shall be dealt with confidentially.
 - 3.1.3 Advice and assistance shall be offered to help any enquirer frame their complaint. Complaints may be accepted verbally or resolved verbally where a written complaint or written response cannot be provided, for whatever reason.

- 3.1.4 Where complaints are made to a Councillor(s) they will be referred to the appropriate officer for investigation. The Councillor(s) will be copied on any response to the complainant.
- 3.1.5 Where complaints are made to an MP and referred to the authority, a response will be provided by the Chief Executive (or, in his absence, a Senior Manager) to the MP.
- 3.1.6 All complainants shall be kept informed of the progress of their complaint and of any delays.
- 3.1.7 All complainants shall be advised of their right to question the response received and request a formal review.
- 3.1.8 All enquirers shall be advised of their right, if they remain dissatisfied, to take any complaint to the Local Government Ombudsman once the Council process has been completed.
- 3.1.9 The Council aims to handle all complaints fairly and honestly regardless of whoever makes a complaint. The Council will treat all members of the community equitably and will not show bias to any particular individual or group.
- 3.1.10 The Council will only consider a complaint which has been made to the authority or a Member of the Council within twelve months of the date on which the person framing the complaint first had notice of the matters alleged in the complaint, unless it is reasonable for the Council to investigate the complaint outside this timescale.
- 3.1.11 The Council will only consider a complaint about an ongoing statutory or regulatory process (such as enforcement) where the complaint relates to maladministration in its operational or administrative processes.
- 3.1.12 The Council will not consider a complaint about an issue where an alternative statutory remedy for the complainant to pursue their complaint exists (eg. School Admissions, Penalty Charge Notices etc), or where an alternative remedy such as legal action is also being sought.
- 3.1.13 The Council will not re-address a complaint on broadly the same or similar lines where the issue has already been addressed through the complaints process and has reached a resolution, unless new evidence or information is provided or a completely new issue is raised. Such complaints may be designated persistent or prolific and be managed in accordance with the relevant procedure.
- 3.1.14 The Council will not re-consider a complaint where a resolution has already been proposed by the Local Government Ombudsman unless requested to do so by the Ombudsman's office following a review.
- 3.1.15 All complaints shall be monitored and performance indicators made available to demonstrate compliance with the agreed timescales.

- 3.1.16 The operation of the complaints process, including responses, will be reviewed bi-annually by a Working Group to monitor trends.
- 3.1.17 All staff shall be provided with training, guidance and procedures to enable them to manage complaints.
- 3.1.18 A member or members of staff shall be assigned specific responsibility for the management and monitoring of complaints
- 3.1.19 The management of the complaints process shall be regularly audited to ensure compliance with the Council's Standards and Procedures.

3.2 Timescales for responses shall be 3 working days for acknowledgement; 10 working days for providing a response at Stage 1; and 20 working days for providing a response at Stage 2. Where the timescales for a response will be exceeded, the appropriate officer shall notify the complainant in writing of the delay and the revised date for a response. Complainants shall be allowed 30 working days in which to raise a Stage 2 complaint after the provision of a response at Stage 1. These and other processes are detailed within the Complaints Procedures

4. **Implementation**

4.1 This Policy will be supported and implemented by the development and publication of Standards (requirements), Procedures (how to) and Guidance (advice) where required.

5. **Roles and Responsibilities**

- 5.1 The overall responsibility for Corporate Complaints management and monitoring within WBC rests with the Chief Executive.
- 5.2 The responsibility for day-to-day management of Corporate Complaints management and monitoring throughout West Berkshire Council rests with the Head of Strategic Support, who is also responsible for maintaining this Policy, for reviewing all other related policies and procedures and for providing advice and guidance on their implementation.
- 5.3 All managers are directly responsible for implementing this Policy and any sub policies and procedures within their service areas, and for the adherence of their staff and others (2.1.2).
- 5.4 All personnel detailed at 2.1.1 and 2.1.2 have an individual responsibility to adhere to this Policy and any relevant Standards and/or Procedures.

6. **Failure to comply with WBC Corporate Complaints Policy**

6.1 This document provides staff and others with essential information regarding management of corporate complaints and sets out conditions to be followed. It is the responsibility of all to whom this Policy document applies to adhere to these conditions. Failure to do so may result in:

- withdrawal of access to relevant services
- informal disciplinary processes

- formal disciplinary action (in accordance with the provisions of the Disciplinary Procedure)

6.2 Additionally if, after internal investigation, a criminal offence is suspected, the Council may contact the police or other appropriate enforcement authority to investigate whether a criminal offence has been committed.

7. **Review**

7.1 This policy will be reviewed to respond to any changes and at least every two years.

7.2 The Service responsible for reviewing and maintaining this Policy is Strategic Support.

Glossary

A complaint is defined as 'an expression of dissatisfaction about the Council or its services.'

A justified complaint is defined as an instance where the Council is at fault because we have failed to do something we should have, or we have done something we should not have. An example would be a failure to respond to correspondence within the timescale set as a target.

A grievance is defined as an instance where the customer is dissatisfied but we are not at fault because we are following an agreed policy or procedure. Examples of grievances might include concerns about an increase in the Council Tax, or the absence of a pavement alongside a road.

The Local Government Ombudsman is the independent Regulator for complaints to local authorities.

Other Relevant Documentation

Corporate Complaints procedure

Persistent and Prolific Complainants procedure

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Individual Executive Member Decision

Title of Report:	Records Management Policy Revision
Report to be considered by:	Individual Executive Member Decision
Date on which Decision is to be taken:	9 th May 2013
Forward Plan Ref:	ID2644

Purpose of Report: To present the revised Records Management Policy for consideration by the Executive Member for Council Strategy & Performance, Housing, ICT, Corporate Support, Legal.

Recommended Action: That the Executive Member for Council Strategy & Performance, Housing, ICT, Corporate Support, Legal approves the revised Records Management Policy.

Reason for decision to be taken: The Policy has been revised to take account of procedural changes, and to be published as an individual document. Previously it was published as part of the Record Retention Schedule, a supporting document

Other options considered: N/A

Key background documentation: Record Retention Schedule

Portfolio Member Details	
Name & Telephone No.:	Councillor Roger Croft - Tel (01635) 868638
E-mail Address:	rcroft@westberks.gov.uk

Contact Officer Details	
Name:	Sue Broughton
Job Title:	Information Management Officer
Tel. No.:	01635 519747
E-mail Address:	scbroughton@westberks.gov.uk

Implications

Policy:	There is a statutory requirement in the Freedom of Information Act 2000 (S46) for a Records Management Policy
Financial:	None
Personnel:	None
Legal/Procurement:	None
Environmental:	None
Property:	None
Risk Management:	Adverse risk if the Council does not have a Corporate Complaints Policy and Procedure
Equalities Impact Assessment:	Attached

Consultation Responses

Members:

Leader of Council:	Councillor Gordon Lundie
Overview & Scrutiny Management Commission Chairman:	Councillor Brian Bedwell
Ward Members:	N/a
Opposition Spokesperson:	Councillor Tony Vickers
Local Stakeholders:	N/a
Officers Consulted:	Andy Day; David Lowe; Heads of Service; Directors
Trade Union:	Rosemary Culmer

Is this item subject to call-in?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
If not subject to call-in please put a cross in the appropriate box:		
The item is due to be referred to Council for final approval		<input type="checkbox"/>
Delays in implementation could have serious financial implications for the Council		<input type="checkbox"/>
Delays in implementation could compromise the Council's position		<input type="checkbox"/>
Considered or reviewed by Overview and Scrutiny Management Commission or associated Task Groups within preceding six months		<input type="checkbox"/>
Item is Urgent Key Decision		<input type="checkbox"/>
Report is to note only		<input type="checkbox"/>

Supporting Information

1. Background

- 1.1 The Freedom of Information Act 2000 S46 included a provision requiring the Lord Chancellor to issue a Code of Practice as guidance to all relevant authorities on the keeping, management and destruction of their records.
- 1.2 The most recent version of the Code of Practice was issued in July 2009 and states:

Records Management Policy

Authorities should have in place a records management policy, either as a separate policy or as part of a wider information or knowledge management policy.

The policy should be endorsed by senior management, for example at board level, and should be readily available to staff at all levels.

The policy provides a mandate for the records and information management function and a framework for supporting standards, procedures and guidelines. The precise contents will depend on the particular needs and culture of the authority but it should as a minimum:

- a) Set out the authority's commitment to create, keep and manage records which document its principal activities;
- b) Outline the role of records management and its relationship to the authority's overall business strategy;
- c) Identify and make appropriate connections to related policies, such as those dealing with email, information security and data protection;
- d) Define roles and responsibilities, including the responsibility of individuals to document their work in the authority's records to the extent that, and in the way that, the authority has decided their work should be documented, and to use those records appropriately;
- e) Indicate how compliance with the policy and the supporting standards, procedures and guidelines will be monitored.

The policy should be kept up-to-date so that it reflects the current needs of the authority. One way of ensuring this is to review it at agreed intervals, for example every three or five years, and after major organisational or technological changes, in order to assess whether it needs amendment.

The authority should consider publishing the policy so that members of the public can see the basis on which it manages its records.

2. Corporate Complaints Policy

- 2.1 The Policy sets out the stated requirements for records management as detailed in the Code of Practice. Its purpose is to assist staff in understanding their responsibilities in respect of corporate records management. It is also intended to

explain to the wider public the way in which records are protected and retained within the Council. It is a public document.

3. Equalities Impact Assessment Outcomes

- 3.1 There is no adverse impact on any identified groups within the Council's staff. This is detailed in the attached Stage One review. There is no requirement for a Stage Two review.

4. Conclusion

- 4.1 The Records Management Policy has been revised in accordance with best practice, and the S46 Code of Practice as revised in July 2009.

5. Recommendations

- 5.1 That the Executive Member for Council Strategy & Performance, Housing, ICT, Corporate Support, Legal approves the revised Records Management Policy.

Appendices

Appendix A – Equality Impact Assessment – Stage 1

Appendix B – Records Management Policy (revised)

Equality Impact Assessment – Stage One

Name of item being assessed:	Records Management Policy
Version and release date of item (if applicable):	Version 3 February 2013
Owner of item being assessed:	Sue Broughton
Name of assessor:	Sue Broughton
Date of assessment:	12 th April 2013

1. What are the main aims of the item?
To ensure compliance with statute and best practice in handling corporate records. This ensures corporate probity and accountability to residents, clients and other stakeholders.

2. Note which groups may be affected by the item, consider how they may be affected and what sources of information have been used to determine this. (Please demonstrate consideration of all strands – age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation)		
Group Affected	What might be the effect?	Information to support this.
All WBC staff creating and managing records	It is considered that there will be no effect on any strands as identified	Policy previously in place in the council
Further comments relating to the item:		

3. Result (please tick by double-clicking on relevant box and click on 'checked')	
<input type="checkbox"/>	High Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input type="checkbox"/>	Medium Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input type="checkbox"/>	Low Relevance - This needs to undergo a Stage 2 Equality Impact Assessment
<input checked="" type="checkbox"/>	No Relevance - This does not need to undergo a Stage 2 Equality Impact Assessment

For items requiring a Stage 2 equality impact assessment, begin the planning of this now, referring to the equality impact assessment guidance and Stage 2 template.

4. Identify next steps as appropriate:	
Stage Two required	
Owner of Stage Two assessment:	
Timescale for Stage Two assessment:	
Stage Two not required:	Stage Two not required

Name: Sue Broughton

Date: 12th April

Records Management Policy

Document Control

Document Ref:	WBC:SS:SCB:0812RM	Date Created:	February 2013
Version:	V3	Date Modified:	
Revision due	February 2015		
Author:	Sue Broughton	Sign & Date:	
Owning Service	Strategic Support		
Equality Impact Assessment: (EIA)	Date undertaken:		
	Issues (if any):		

Corporate Director (Resources Directorate)	Sign & Date:	
Corporate Director (Communities Directorate)	Sign & Date:	
Corporate Director (Environment Directorate)	Sign & Date:	

Change History

Version	Date	Description	Change ID
1	30/09/05	Original records retention schedule, V1, service specific (no Policy)	
2	15/08/06	Revised records retention schedule V2 including Policy statement	
3			



Contents

1. Purpose	3
2. Applicability	3
3. Policy	3
4. Implementation	4
5. Roles and Responsibilities	4
6. Failure to comply with WBC Records Management Policy	4
7. Review	5
Glossary	6
Other Relevant Documentation	6

1. Purpose

- 1.1 The purpose of this policy is to support West Berkshire Council's officers to manage records in accordance with best practice and to ensure the Council's organisational compliance with legislation and regulatory obligations.
- 1.2 This policy applies to all records of West Berkshire Council, regardless of the medium (including paper, microform, electronic and audio-visual) which are created, collected, processed, used, stored and/or disposed of by the council's employees, partners and agents in the course of the council's statutory activities.
- 1.3 The Records Management Policy has been approved by Individual Executive Member Decision on [date].

2. Applicability

- 2.1 This Policy applies to:
 - 2.1.1 All non-school based employees working for the Council, including those working from home or at non-Council locations.
 - 2.1.2 Other persons including Elected Members, Consultants, Agency staff and Contractors working for the Council, external organisations working with the Council, whilst engaged on Council business .
- 2.2 It is the responsibility of each employee and other person mentioned in Section 2.1.2 to familiarise themselves with and adhere to this Policy.
- 2.3 Adherence to this Policy is a condition of working for the council or using its assets.
- 2.4 This document is published separately on the Council's website www.westberks.gov.uk/recordsmanagement
- 2.5 This Policy has had consultation with Heads of Service and Trade Unions and has been ratified by Individual Executive Member Decision.

3. Policy

- 3.1 It is the Policy of the Council to ensure that :
- 3.2 All records created and retained are authentic and reliable, providing accurate evidential and accountable content on the Council's decisions and activities.
- 3.3 All records created are accessible to the authorised users and the information contained therein is accessible on request to the public unless the content is exempt under legislation.
- 3.4 All records are maintained in a format which facilitates auditing and other legal processes.

- 3.5 All records created or obtained are stored securely, and protected against loss or damage which would impact upon the proper and effective conduct of the authority.
- 3.6 Any records which are no longer required, which are duplicated or superseded, are disposed of appropriately, including confidential records in any format, and electronic records.
- 3.7 Any records which must be archived and retained are retained in an appropriate format and an appropriate and secure location, and are indexed, and readily accessible if required.
- 3.8 Appropriate business contingency provisions are made to ensure the continuance of vital Council services during an emergency.
- 3.9 The authority fulfils its legal and statutory requirements and complies with regulatory provisions on records management such as the S46 Code of Practice.
- 3.10 The needs of the council's stakeholders, including the public, the partnerships to which it is contracted or with which it co-operates, its employees, and the National Archives and other record repositories, are fully met.

4. Implementation

- 4.1 This Policy will be supported and implemented by the development and publication of Standards (requirements), Procedures (how to) and Guidance (advice) as required.

5. Roles and Responsibilities

- 5.1 The overall responsibility for records management within the Council rests with the Head of Strategic Support.
- 5.2 The responsibility for day-to-day oversight of records management throughout West Berkshire Council rests with the Scrutiny and Partnership Manager and the Information Management Officer, Strategic Support, they are also responsible for maintaining this Policy, for reviewing related procedures and for providing advice and guidance on their implementation.
- 5.3 All managers are directly responsible for implementing this Policy and any sub policies and procedures within their service areas, and for the adherence of their staff and others (2.1.2).
- 5.4 All personnel detailed at 2.1.1 and 2.1.2 have an individual responsibility to adhere to this Policy and any relevant Standards and/or Procedures.

6. Failure to comply with WBC Records Management Policy

- 6.1 This document provides staff and others with essential information regarding records management and sets out conditions to be followed. It is the responsibility of all to whom this Policy document applies to adhere to these conditions. Failure to do so may result in:

- withdrawal of access to relevant services

- informal disciplinary processes
- formal disciplinary action (in accordance with Council's Disciplinary Procedure)

6.2 Additionally if, after internal investigation, a criminal offence is suspected (for example under the Data Protection Act), the Council may contact the police or other appropriate enforcement authority to investigate whether a criminal offence has been committed.

7. **Review**

7.1 This policy will be reviewed to respond to any changes and at least every two years.

7.2 The Service responsible for reviewing and maintaining this Policy is Strategic Support.

Glossary

In this document a **Record** refers to any information held within any format which is intended to be retained for a business purpose either for statutory or best practice reasons.

Other Relevant Documentation

Record Retention Schedule (under revision)

Records Management Procedures (under revision)

Secure (Encrypted) Email Guidance

Security Policy

Standard - Protective Marking

Procedure – Security of Hardcopy Documents outside WBC offices

Security Procedures for the Move of Documents During Office Moves

Office and Workstation Safekeeping Standard