Ministry of Education
Cayman Islands Government

VERSION 1.0

INFORMATION MANAGEMENT POLICY

SUMMARY

Policy name:	Information Management Policy
Publication Date:	July 2024
Review Date:	
Related legislation/applicable section of legislation:	• *National Archive and Public Records Law (2015 Revision)* • *Freedom of Information Act (20021 Revision)* • *Evidence Law (2019 Revision)* • *Electronic Transactions Law (2003 revision)* • *Public Management and Finance Law (2020 Revision) and Regulations (Amendment) 2023* • *Public Service Management Law (2018 Revision) and Personnel Regulations (Amendment) 2022*
Approved by:	Chief Officer
Approval date:	June 2024
Applies to:	Core Ministry

REVISION RECORD

Date	Version	Revision Description

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1. PURPOSE

The purpose of this policy is to establish a framework for the creation and management of information within the Ministry of Education (the Ministry).

The Ministry is committed to establishing and maintaining information management practices that meet its accountability requirements, business needs and stakeholder expectations.

2. SCOPE

This policy applies to all Ministry staff; all aspects of the Ministry's operations; all content and data created to support the agency's business activities regardless of format, medium or age; and all software applications used to create corporate information.

3. POLICY STATEMENT

The Ministry is committed to implementing best practice information management systems to ensure the creation, maintenance and protection of *full and accurate* records.

The Ministry recognizes its regulatory obligations as a public sector agency under the *National Archive and Public Records Law (2015 Revision).* The Ministry is committed to the practices set out in the International Standard ISO 15489–2001 and all standards and guidance established by the Cayman Islands National Archive for all government agencies.

4. POLICY CONTEXT

The Ministry's planning framework is influenced by the strategic priorities of Government and by the commitment to civil service reform.

The Ministry supports a holistic approach to the management of all corporate information, and seeks to integrate its policies and procedures within the broader information management strategies of Government.

This includes:

- The Deputy Governor's *Code of Practice on Records Management*
- Approved Administrative File Plans and Disposal Schedules

- Government Email Policy
- Government Security Policy

5. REGULATORY FRAMEWORK

The Ministry recognizes its statutory obligations to be accountable for its actions, and is committed to compliance with laws that affect information management in Government, including:

- *National Archive and Public Records Law (2015 Revision)*
- *The Freedom of Information Act (2021 Revision) & the Freedom of Information (General) Regulations, (2021 Revision)*
- *Evidence Law (2019 Revision)*
- *Electronic Transactions Law (2003 revision)*
- *Public Management and Finance Law (2020 Revision) and Regulations (Amendment) 2023*
- *Public Service Management Law (2018 Revision) and Personnel Regulations (Amendment) 2022*

The Ministry is committed to developing and maintaining information management systems that capture and maintain records with appropriate evidential characteristics in accordance with the requirements of these laws.

6. RECORD KEEPING SYSTEMS

The Ministry utilizes physical and electronic records management systems and comprised of printing and filing documents in secure cabinets. Additionally, electronic documents are stored with the Computer Services Department (CSD's) L-Drive and O-Drive.

The Ministry's physical filing system is managed by each department and controlled by designated representatives. Documents are categorized according to a File Plan and filed according to subject matter in each department. Spreadsheets are used to track these physical files including those that are archived or in storage. The system indicates where all operational and administrative records are captured and stored.

All records, regardless of format or location, are retained and disposed of according to disposal schedules issued by the National Archive and approved by Cabinet.

The Ministry's record keeping systems are dedicated to creating and maintaining authentic, reliable and useable records which meet the needs of internal and external stakeholders. Records are maintained for as long as they are required to effectively and efficiently support the business functions and activities of the Ministry.

The Ministry's record keeping systems manage the following processes:

- creation and capture of records;
- control, access and tracking of records;
- protection of record integrity, reliability and authenticity;
- security and storage of records;
- disposal of records in accordance with approved disposal schedules; and
- identification of vital records.

The Ministry's record keeping systems assist in making and maintaining full and accurate records. Full and accurate records are:

- **compliant** with the record keeping requirements established by the National Archive or by other regulatory bodies and laws;
- **adequate** for the purposes for which they are kept;
- **complete** in content and containing the structural and contextual information necessary to document a transaction;
- **meaningful** with regards to information and/or linkages that ensure the business context in which the record was created and used is apparent;
- **comprehensive** in documenting the complete range of business for which evidence is required by the organization;
- **accurate** in reflecting the transactions that they document;
- **authentic** in providing proof that they are what they purport to be and that their purported creators did indeed create them; and
- **inviolate** through being securely maintained to prevent unauthorized access, alteration or removal.

The Ministry has a filing system for unstructured electronic records, such as email and common office documents. (e.g. documents created in Word, Excel, Publisher or PowerPoint). These records should be printed and placed on the appropriate physical file as soon as practicable after their creation or

receipt, in accordance with the Government Email Policy and the National Archive's Guidance for Managing Electronic Records.

While the print and file system constitute an integral part of the Ministry's record keeping system for all operational and administrative records, there are a number of databases and software applications which contain records that cannot be easily printed and filed. These systems function as record keeping systems, including:

- *MyVista for records of employee attendance and leave*
- *CSD's L-Drive and O-Drive for the Ministry's electronic files*

The Ministry consults with the National Archive and Computer Services Department as necessary, to ensure that the implementation of new technology is consistent with Government's information policy framework and compatible with Government's technological infrastructure.

All of the Ministry's records should be created and maintained within the preferred record keeping systems outlined above or as specified by the Chief Officer.

Official records **should not** be maintained in email inboxes, shared folders, U drives, hard drives, or on removable media (e.g. CDs, USB drives). These electronic storage facilities do not contain record keeping functionality. They cannot ensure that records will be managed and maintained, to support (and provide evidence of) business activities over time.

These storage areas may be used for reference copies only.

7. ROLES AND RESPONSIBILITIES

Roles	Responsibilities
Chief Officer	• authorize the Information Management Policy; • be accountable for the overall records and information management practices of the Ministry including the creation and control of records, development of an operational disposal schedule, protection of information assets from damage and unauthorized access/alteration or destruction.

	• provide sufficient support and resources for ensuring a successful information and records management programme; and • promote compliance with the relevant legislation and the National Archive's record keeping policies and procedures.
Managers and supervisors of the Ministry's staff:	• monitor staff under their supervision to ensure that they understand and comply with information management policies and procedures; and • support and foster a culture within their team that promotes good information management practices.
Information and Records Manager:	• develop strategies to support the Information Management Policy; • ensure that Ministry's Information Management practices comply with legal obligations; • develop, maintain and review the Ministry's records and information management policies, procedures, tools and systems; • prepare and execute Continuity of Operations Plan which includes the protection of all informational assets, particularly vital records; • coordinates the publication of information according to the Publication Scheme; • provide public access to information under the *Freedom of Information Act*: receive, analyze and assess applications for access; communicate with and assist applicants; • liaise with the Information Rights Unit; compile and report all required statistics; • receive complaints and prepare for appeals before the Ombudsman; • liaise with Computer Services Department and private vendors to maintain the technology used for managing electronic records;

	• network with other Information Managers to share knowledge and solve common issues; • disseminate information management policies, procedures, tools and systems to all staff; • deliver or arrange information management training for the Ministry's staff; and • monitor staff compliance and report to the Chief Officer.
ICT Department	• be responsible for the day-to-day maintenance of electronic systems that stores records; • work in conjunction with the records/information manager to ensure that public records are properly managed, protected and appropriately preserved for as long as they are required for business, legal and long-term preservation purposes; • ensure that all electronic systems capture appropriate systems generated metadata and audit trail data for all electronic records to ensure that authentic and reliable records are created. • ensure that electronic records in all electronic systems remains accessible by migrating them to new hardware and software platforms when there is a danger of technology obsolescence including media and format obsolescence. • ensure that all data, metadata, audit trail data, operating systems and application software are backed up on a daily, weekly and monthly basis to enable the recovery of authentic, reliable and accessible records should a disaster occur. • ensure that back-ups are stored in a secure off-site environment or an approved cloud service in accordance with the Data Protection Act.

Departmental Records Officers:	• apply record keeping rules as per the applicable Policies; • use file plans to classify and name files; • create and close files; place documents onto files; • track paper files; • arrange retrieval of records to/from storage locations; • apply disposal schedules to transfer or destroy records; arrange and document disposal; • to execute disaster control plans for records; • network with other Records Officers to share information and solve common problems; • support and advise other staff in the use of RMS, the file plan, creation of files, naming files, filing, classification, retention and disposal of records.
All staff of the Ministry:	• understand the record keeping obligations and responsibilities that relate to their position; • adhere to policies and procedures by keeping records that document their daily work • create and capture records into official record keeping systems for the following business activities: o approval or authorization o guidance, advice or direction o information relating to projects or activities being undertaken o formal business communications between staff and external recipients o formal business communications between staff; and • only destroy records under an authorized disposal schedule or other standards approved by the National Archive.

8. MONITORING

Staff and system compliance with this Information Management Policy should be regularly monitored. Monitoring activities should be carried out by Managers and the Records and Information Manager.

9. REVIEW

The Information and Records Manager will review this Information Management Policy under the direction of the Chief Officer on an annual basis or earlier if required.

10. AUTHORISATION

This policy has been approved by the Chief Officer.