



Information Security Document

**Guidance for the Off-site Storage
of Documents**

Version 9.0

Version History																									
Version	Date	Detail	Author																						
1.0		Published	Unknown																						
2.0	24/08/2011	Reviewed by Information Governance Group. Version 1.0 taken and reworked.	David Jenkins																						
3.0	31/10/2012	Reviewed by Information Governance Group	David Jenkins																						
4.0	29/11/2013	Reviewed by Information Governance Group. Word securely inserted on page 4. Line inserted at end of page 5.	David Jenkins.																						
5.0	16/12/2014	Reviewed by Information Governance Group. Re-formatted with numbering. Addition of guidance on destruction dates (page 4), procedures for bulk orders (page 4), and additional guidance on retrieval (page 5). Updated with ISO27001:2013 controls.	David Jenkins																						
6.0	08/02/2016	Reviewed by Information Governance Group. Links to user guide and prices updated.	David Jenkins																						
7.0	06/03/2017	Reviewed by Information Governance Group. No changes.	David Jenkins																						
8.0	08/05/2018	Reviewed by Information Governance Group. Change of service provider.	Mark Smith																						
9.0	08/07/2019	Reviewed by Information Governance Group. References to GDPR inserted. Stronger wording re: importance of contents database/inventory, p5.	Mark Smith																						
<p>This document has been prepared using the following ISO27001:2013 standard controls as reference:</p> <table border="1"> <thead> <tr> <th>ISO Control</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>8.1</td> <td>Responsibility for assets</td> </tr> <tr> <td>8.2.1</td> <td>Classification of information</td> </tr> <tr> <td>8.2.2</td> <td>Labelling of information</td> </tr> <tr> <td>8.2.3</td> <td>Handling of assets</td> </tr> <tr> <td>8.3.3</td> <td>Physical media transfer</td> </tr> <tr> <td>11.1.4</td> <td>Protecting against external and environmental threats</td> </tr> <tr> <td>15.1.2</td> <td>Addressing security within supplier agreements</td> </tr> <tr> <td>15.2.1</td> <td>Monitoring and review of supplier services</td> </tr> <tr> <td>18.1.1</td> <td>Identification of applicable legislation and contractual requirements</td> </tr> <tr> <td>18.1.4</td> <td>Privacy and protection of personally identifiable information</td> </tr> </tbody> </table>				ISO Control	Description	8.1	Responsibility for assets	8.2.1	Classification of information	8.2.2	Labelling of information	8.2.3	Handling of assets	8.3.3	Physical media transfer	11.1.4	Protecting against external and environmental threats	15.1.2	Addressing security within supplier agreements	15.2.1	Monitoring and review of supplier services	18.1.1	Identification of applicable legislation and contractual requirements	18.1.4	Privacy and protection of personally identifiable information
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1. Introduction:

- 1.1. As part of the Council's obligations under Section 46 of the Freedom of Information Act 2000 we are required to make proper arrangements for the storage of the records created by the Council. This storage should provide protection to the level required by the nature and value of the information held within the records.
- 1.2. Making proper arrangements for the storage of records can lead to cost savings including freeing up valuable office space by removing records which are no longer required for day-to-day business use. Many departments and services within the Council may find it more cost-effective to store their semi-current and non-current records away from main office premises.
- 1.3. Many of the records created and managed by the Council will require secure storage due to the personal information contained within them. The secure storage of records that contain personal information (found within records such as client case files) will allow the Council to comply with the General Data Protection Regulation (GDPR) in respect of maintaining the security of personal data.
- 1.4. As part of the Council's records management arrangements, the Council has a contract for the off-site storage of records. Departments and services may send records to the contractor, and can expect retrieval of records within 24 hours. Same day retrieval of records is also available in exceptional circumstances. The current contractor is Restore Plc Ltd. based in Swadlincote. In May 2018, TNT (the previous contractor) was acquired by Restore Plc.
- 1.5. A comprehensive user is available at the following link: <https://edrmlive/livelink/lisapi.dll/open/22699252>. The guidance below refers to the general principles which can relate to off-site storage.

2. Scope:

- 2.1. This guidance applies to all departments, sections and divisions of Derbyshire County Council which retain current, semi-current and non-current records in whatever format and make use of the off-site storage contract.

3. Deciding what records to send to off-site storage:

- 3.1. In general, current records used on a regular basis should not be sent to off-site storage. A current record is one to which reference is routinely made or which has been closed for less than one year. Financial records relating to the current year are an example, as are operational records for active projects.
- 3.2. In order to decide what records to send to off-site storage is it essential that the material is appraised. This appraisal process should include considering the following:
 - Have retention/disposal dates been identified on records retention schedules and agreed with departmental management?
 - Has an assessment been made of the probability of the records being needed for business purposes before the retention period is over?
 - How often has a file from the series been consulted?
 - Have other options been considered? (e.g. transfer of historical archives to Derbyshire Record Office)
 - Is the disposal date within two years? If so, off-site storage may not be the most cost-effective option.

- 3.3. The appraisal of records should normally be limited to series level (i.e. folder level) rather than looking at individual documents or files. However in some exceptional cases file level appraisal may be required, particularly if legacy records are being appraised.
 - 3.4. When considering sending records to be stored off-site the probability and frequency of their retrieval should be considered. If records are going to be retrieved on a regular basis off-site storage is unlikely to be the most cost-effective option given the cost of transporting the records
4. Before sending records to off-site storage:
 - 4.1. When considering sending records to off-site storage an initial check should be made as to whether the material needs to be retained for legal or operational purposes. This can be done by checking the relevant records retention schedule for the records concerned (available at www.derbyshire.gov.uk/confidentialwaste). If the records are beyond their retention period, or if the records are due for imminent disposal, it may not be appropriate to send them to off-site storage. In these circumstances retaining the records securely in offices is the more appropriate option if space is available.
 - 4.2. The use of off-site storage should not be used as a means of deferring decisions on retention periods, especially for legacy records about which limited information may be available. Some records could be destroyed; others weeded; others transferred to Derbyshire Record Office.
 - 4.3. When sending records to off-site storage it is essential that a disposal date be applied to each box. This will help to encourage the proactive use of records retention schedules and helps ensure that time-expired records are disposed of accordingly in compliance with the GDPR principles in respect of the retention of personal information. This includes records stored off-site. If boxes are sent to storage without a destruction date visible on the box then the box will be quarantined on arrival and held there until a destruction date is provided.
 - 4.4. If staff are sending significant quantities of boxes which would need secure storage prior to collection by Restore Plc they should contact Records Management (email: records.management@derbyshire.gov.uk) to discuss appropriate measures to take. Boxes should not be left unattended in corridors prior to collection, this also applies to boxes being retrieved from Restore Plc.
 5. Sending Boxes for Storage:
 - 5.1. When organising the transfer of records to off-site storage the records will need to be boxed for storage. The contractor provides boxes for a reasonable cost. When boxing records it is advisable to box together records which have the same records retention period. For example keeping together case files of clients with the same date of birth is a useful method as many case files will have their disposal triggered a number of years after a client's date of birth. This approach is a practical one which helps ensure the disposal of time-expired records is implemented. When records with varying retention periods are kept within one box the application of disposal processed can be problematic and can incur additional and avoidable costs (i.e. the requirement to recall a box to weed out which records require disposal and which need to be retained).
 - 5.2. When sending boxes to off-site storage it is important to consider who should be permitted to request their retrieval. Departments/sections using off-site

storage will need to identify certain 'authorised users' who are permitted to request the retrieval of boxes, and the deposit of new boxes. The contractor will only accept requests from these authorised users. It is advisable to have a number of authorised users to ensure the efficient retrieval/deposit of boxes if one or more users is not available to authorise actions. The Corporate Records Manager reviews the list of authorised users on a 6 monthly basis. If staff changes occur after the regular review it is important to inform the Corporate Records Manager as soon as possible to enable the list to be updated.

- 5.3. Departments using the service must maintain a record of exactly what material which has been transferred to off-site storage, including the retention/disposal date. This will normally be in the form of a locally maintained database with an inventory of boxes and the disposal date associated with them. It is vitally important that this record be kept accurate and up-to-date, as problems associated with misplaced records often originate in uncertainty over the contents of the transferred boxes. Under the terms of the current contract the contractor does not hold details of the content of boxes, only of the box's origin and 'owner'.

6. Retrieving and returning boxes to Restore Plc:

- 6.1. The storage costs of off-site storage are extremely competitive and are significantly cheaper than other options. However the retrieval of these records does incur significant costs meaning that it is most cost-effective for records to be sent to off-site storage if they are only likely to be retrieved infrequently.
- 6.2. Request for retrieval of boxes should be made in writing to Restore Plc (or via email) or by using the RS Web portal.
- 6.3. In order to make cost effective use of the Restore Plc contract, staff who are retrieving boxes from Restore Plc they should ensure that these are requested in one single order sent to Restore Plc before 4pm (if a number of retrieval requests are made separately in a single day they can be treated as separate work orders by Restore Plc staff, and so not attract the bulk order discount).
- 6.4. If boxes have been mis-delivered (e.g. you have received another department's boxes) you should contact Records Management and Restore Plc Customer Services immediately to arrange for them to retrieve the boxes and send them to the correct address. You should also report this as a Security Incident via the Service Desk.
- 6.5. Before payment is made to the supplier under the contract, individual invoices should be verified to ensure that the correct rates have been charged for the service provided.

7. Routine Management of Off-site Storage

- 7.1. When boxes reach the end of their retention period the contractor can undertake confidential and secure disposal on behalf of the Council. This disposal requires the approval of an authorised user and countersigned by a second authorised user from that same department. It is often more cost-effective to use this service rather than to retrieve a box and dispose of it 'in-house' at DCC premises. This is because disposal by the contractor does not incur any transport costs. Clear records should be maintained of who has authorised the disposal of records to support the authorisation given and which records are to be disposed of.

- 7.2. For additional information on off-site storage and to report any issues email the Corporate Records Manager (records.management@derbyshire.gov.uk).
- 7.3. Departmental contacts should periodically review the list of authorised users of the RS Web portal to ensure only current employees retain access.

This document is owned by the Information Governance Group and forms part of the Council's ISMS Policy and as such, must be fully complied with.

FREQUENTLY ASKED QUESTIONS

Q. Who is the contractor for off-site storage of records?

A. The contractor is currently Restore Plc (previously TNT Business Solutions Ltd) and DCC records continue to be stored at their Swadlincote facility.

Q. What are the arrangements for using the Restore Plc contract?

A. A number of elements need to be in place to use the Restore Plc contract effectively:-

- You need to have a records retention schedule (with disposal dates identified) for all material you propose to send off-site. All files in the same file box should have the same retention/disposal date.
- An account needs to be set up (or you need to be part of an existing account) with Restore Plc. It is advisable to check whether an established account with Restore Plc will meet your needs.
- You need to identify a contact person and location for invoices. These will be raised on a monthly basis by Restore Plc.
- You need to identify who is authorised to order collection and retrieval of DCC records. Restore Plc will only accept orders from authorised officers and by email (not telephone or fax).
- You need to specify the locations from where DCC records will be collected and to where they will be returned
- Records need to be boxed. Flat pack boxes in packs of 10 are available from Restore Plc for a reasonable charge (it is advisable to order boxes in bulk to minimise the transport costs).
- You need to attach a barcode (supplied by Restore Plc) to each box and maintain your local database of records. Do not use barcodes belonging to another department or location.
- To request boxes from storage, fill in the Restore Plc e-form for an asset request. For new consignments and for returns to storage, use special forms printed in triplicate and available from Restore Plc.

Q. Can we send any records to Restore Plc?

A. It is not advisable to send records in frequent use for storage off-site. You should not send damaged or deteriorated records for off-site storage without specialist advice. You can send non-paper records (DVDs, computer tapes, videos). Outsize records (i.e. architects' or engineers' drawings) which will not fit in a standard Restore Plc box will incur an extra charge.

Q. Can we ring up Restore Plc and ask them to collect records?

A. No, Restore Plc requires written requests on their pre-printed forms or via the RS Web portal.

Q. Is there a minimum quantity Restore Plc will collect?

A. No, there is no minimum quantity of boxes for collection, but it is more cost-effective to transfer a substantial consignment.

Q. When will Restore Plc collect records?

A. Restore Plc will email all authorised users to request collection details (i.e. box numbers and addresses) and users will need to reply by a specific deadline with appropriate forms. Collections normally take place on the 20th of each month.

Q. What do we do if we need to move records urgently?

A. Restore Plc will collect in between the monthly cycle by arrangement.

Q. How much does it cost?

A. Restore Plc costs can be found at the following link
<https://edrmlive/livelink/lisapi.dll/open/22738082>

Q. How do we get records back?

A. Fill-in the Restore Plc e-form with the Restore Plc barcode and address details and email it to them as an attachment.

Q. How soon can we get records back?

A. Within 24 hours. Restore Plc offers a 'next day' delivery service for orders received by 4pm on a working day.

Q. What if it is really urgent?

A. You can request 'same day' delivery, but this will incur an extra charge.

Q. I only want one or two files from a box. Can I request these rather than the whole box?

A. No, the current contract only allows for the retrieval of boxes and not individual files.

Q. Does Restore Plc offer a destruction service for documents in-store, and if so at what cost?

A. Yes, Restore Plc offers this service to DCC. Restore Plc will follow the agreed DCC Procedure for notification at the end of the retention period, destruction and certification at a cost of approximately £2.00 per box.

Q. When will we be invoiced?

A. Invoices will be raised monthly and set to the departmental contact identified for invoicing.

Q. Where can I find the Restore Plc user guide?

A. On EDRM at: <https://edrmlive/livelink/lisapi.dll/open/22699252>

Q. Where can I find the Restore Plc e-form for an asset request?

A. An Asset Request Form is available within the Restore Plc User Guide (page 10)

Q. How will we know whether or not the new contract is satisfactory?

A. Quarterly data is supplied to the Corporate Records Manager. In addition, departmental contacts will be invited to report to regular meetings of the Restore Plc contract user group in Derbyshire Record Office. Any issues regarding the performance of the off-site storage contract should be referred to the Corporate Records Manager. The Corporate Records Manager will also send quarterly monitoring data to designated departmental managers.