RECORDS MANAGEMENT PLAN

DOCUMENT VERSION CONTROL

Date	Author	Version	Status	Reason for Change
Nov 2016	SEStran	1.0	Final draft for approval by the P&A Committee and Partnership Board	
Jan 2017	SEStran	1.1	FINAL	Revised following guidance from Fife Legal Services and NRS in advance of formal submission to the Keeper of the Records
June 2017	SEStran	1.2	FINAL	Revised following IT project implementation and delivery of staff training
Oct 2017	SEStran	1.3	FINAL	Adoption of version control
Dec 2018	SEStran	1.4	FINAL	Revised following Edinburgh City Archives MOU, Senior Officer change and PUR
May 2019	SEStran	1.5	FINAL	Minor amendment to remove Interim from Partnership Director job title.

Contents

Introduction

SEStran is required under the terms of Section 1 of the Public Records (Scotland) Act 2011 to produce a Records Management Plan (RMP) setting out proper arrangements for the management of its public records and to submit this to the Keeper of the Records of Scotland for approval, and thereafter manage its records in accordance with the plan.

The scope of the plan applies to all records irrespective of the technology used to create and store them or the type of information they contain.

SEStran is a small organisation (less than 10 employees) operating from a single office. Our compliance with the Public Records (Scotland) Act 2011 takes account of this and aims to be proportionate in approach.

Furthermore, SEStran holds minimal personal or other sensitive data and most of our key records are routinely published.

Records Management Plan

SEStran's Records Management Plan is based on the Keeper of the Records of Scotland's published Model Records Plan and comprises of the following 14 elements:-

1. Senior Management Responsibility

2. Records Manager Responsibility

3. Records Management Policy Statement

4. Business Classification

5. Retention Schedules

6. Destruction Arrangements

7. Archiving and Transfer Arrangements

8. Information Security

9. Data Protection

10. Business Continuity and Vital Records

11. Audit Trail

12. Competency Framework for Records Management Staff

13. Assessment and Review

14. Shared Information

Element 1:	Senior Management Responsibility
Identify an individual at senior level who has overall strategic responsibility for records management	

1.1   The Senior Officer within SEStran with overall strategic responsibility for records management is:

       Jim Grieve
       Partnership Director
       SEStran
       Area 3D (Bridge)
       Victoria Quay
       Edinburgh
       EH6 6QQ

       Tel: 0131 524 5160

1.2   The Partnership Director fully endorses this plan and will ensure the required improvements to records management procedures are implemented corporately and monitored by the designated officers through the assessment and review process.

Evidence:

1.   Covering letter from the Partnership Director of SEStran.

2.   Records Management Policy.

Future Development:

There are no planned future developments for Element 1.

Assessment and Review:

This element will be reviewed as soon as there are any changes in personnel.

Responsible Officer(s):

Partnership Director, Jim Grieve

Element 2:	Records Manager Responsibility
Identify an individual within SEStran, answerable to senior management, to have day to day operational responsibility for records management within SEStran	

2.1   The individual answerable to Senior Management within SEStran and who has operational responsibility for records management is:

> Angela Chambers
> Business Manager
> SEStran
> Area 3D (Bridge)
> Victoria Quay
> Edinburgh
> EH6 6QQ
>
> Tel: 0131 524 5154
> Email: angela.chambers@sestran.gov.uk

Evidence:

1.   Covering letter from the Partnership Director of SEStran.

2.   Records Management Policy.

3.   Business Manager's Job Description.

4.   Business Manager - Certificates of Training

Future Development:

There are no planned future developments for Element 2.

Assessment and Review:

This element will be reviewed as soon as there are any changes in personnel.

Responsible Officer(s):

Partnership Director, Jim Grieve

Element 3:	Records Management Policy Statement
The records management policy statement underpins the effective management of SEStran's records and information. It demonstrates to employees and stakeholders that managing records is important to SEStran and serves as a mandate for the activities of the Records Manager	

3.1 SEStran recognises that the effective management of its records, regardless of format, is essential in order to support its functions, to comply with legal, statutory and regulatory obligations and to demonstrate transparency and accountability.

3.2 Records are a vital asset and resource and must be managed effectively from creation to disposal.

3.3 SEStran's RMP sets out the policies and procedures that are in place to manage its records properly.

3.4 The Records Management Policy and Guidance are available on the staff drive and SEStran website.

Evidence:

1. Records Management Policy and Records Management Guidance.

2. Statement of Compliance

3. Minutes of the Partnership Board Meeting December 2016.

4. Email to staff.

5. Link to website.

Future Development:

There are no planned future developments for Element 3.

Assessment and Review:

The Records Management Policy and Guidance is subject to annual review.

Responsible Officer(s):

Partnership Director, Jim Grieve
Business Manager, Angela Chambers

Element 4:	Business Classification
A business classification scheme describes what business activities the organisation undertakes – whether alone or in partnership	

4.1 SEStran's Business Classification Scheme is based on the Partnership's main functions. These are listed as follows:

- Strategy
- Projects
- Governance
- Administration
- Human Resources
- Finance

4.2 The departmental paper filing hierarchies and records are categorised by the functional units and business classification.

4.3 Electronic records are stored in appropriate folders in the networked shared drive.

Evidence:

1. Business Classification Scheme/Retention Schedule.

2. SEStran Full File Index.

3. Records & IT Management Report to Partnership Board 23 September 2016

4. Sharepoint File Structure Screen shot.

Future Development:

SEStran are in the process of upgrading the IT provision within the organisation and work has commenced on development of a new electronic filing structure that will be based on core functions as outlined in the Business Classification Scheme. The target for completion is 31st March 2017.

IT upgrades ongoing, Office365 operational with Business Classification file structure in place.

Assessment and Review:

The Business Classification Scheme will be monitored and reviewed to ensure all functions are represented.

Responsible Officer(s):

Partnership Director, Jim Grieve
Business Manager, Angela Chambers

Element 5:	Retention Schedules

A retention schedule is a list of records for which pre-determined destruction dates have been established.

5.1 SEStran operates a retention schedule which has been drafted in line with Local Government Partner Authorities and EU Project rules.

5.2 Retention periods have been mapped to the Business Classification scheme which also draws on the Scottish Council on Archives Records and Retention Schedules (SCARRS)

5.3 The Records Manager applies the retention decisions manually.

Evidence:

1. Business Classification Scheme/Retention Schedule.

2. SEStran Full File Index.

3. Screen shot of electronic filing/disposal log.

4. Information Governance Training

Future Development:

There are no planned future developments for Element 5.

Assessment and Review:

Retention schedules will be reviewed annually and monitored by the Business Manager and revised in line with updates made to SCARRS.

Responsible Officer(s):

Business Manager, Angela Chambers.

Element 6:	Destruction Arrangements

It is not always cost effective or practical for an organisation to securely destroy records in-house. Many organisations engage a contractor to destroy records and ensure the process is supervised and documented

6.1   SEStran recognises the importance of following correct procedures when destroying business information in order to minimise the risk of an information security incident and to ensure that SEStran meets its obligations in relation to the effective management of its records throughout their lifecycle.

6.2   SEStran generates a low number of paper documents and uses an on-site paper/CD shredder which ensures paper and optical media is destroyed to 4x35mm cross cut, security level P-4 and S3. This can then be recycled in the general recycling or collected as confidential waste.

6.2   SEStran makes use of shared resources facilitated by the organisation's landlords; one of these is secure document shredding. Currently this service is provided by Shred It which disposes of material shredded in the office and also provides destruction service for bulk confidential paper records.

6.3   SEStran has an arrangement with its IT Contractor (Onestop IT) for the provision of secure IT Hardware destruction.

Evidence:

1.   In house shredder specifications.
https://www.rexeleurope.com/en/ie/5968/2102563/prostyle-12-cross-cut-shredder#.Wid82VOLS71

2.   Details of Landlord's sensitive waste contract with Shred-It.

3.   Destruction Certificate/Waste Transfer Note

4.   Managing Records and Documents Protocol

Future Development:

There are no planned future developments for Element 6.

Assessment and Review:

Destruction arrangements will be subject to annual review by the Business Manager.

Responsible Officer(s):

Partnership Director, Jim Grieve
Business Manager, Angela Chambers.

Element 7:	Archiving and Transfer Arrangements
This is the mechanism by which an organisation transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions	

7.1   SEStran have a Memorandum of Understanding with Edinburgh City Archives to facilitate the transfer of enduring records to the city archive.

Evidence:

1.   Memorandum of Understanding between SEStran and Edinburgh City Archives.

2.   Email correspondence with National Records Scotland and Edinburgh City Archives

Future Development:

To finalise transfer arrangements between SEStran and Edinburgh City Archives.

Assessment and Review:

The archiving and transfer arrangements will be reviewed in line with the MOU.

Responsible Officer(s):

Partnership Director, Jim Grieve
Business Manager, Angela Chambers

Element 8:	Information Security

Information security is the process by which an organisation protects its records and ensures they remain available. It also maintains privacy where appropriate and provides for the integrity of the records

8.1   SEStran has implemented a robust Information Security Policy to ensure that the Partnership is protected from unauthorised access, use, disclosure, disruption, modification or destruction by which all staff and contractors must comply. This policy was scrutinised by the Performance & Audit Committee before being approved by the Partnership Board.

Evidence:

1.   Information Security Policy.

2.   Minutes of the Performance & Audit Committee and Partnership Board meetings

3.   Members Code of Conduct

4.   SEStran Home Working Policy

5.   SEStran ICT Policy

6.   Draft Business Plan 2017/18 (To be presented to Partnership Board [2 March 17] for approval)

Future Development:

The Partnership Director has made a commitment to provide training to all staff on Information Security Awareness, Data Protection, Records Management and Social Media. (Also see element 12) **Delivered March 2017.**

Security Awareness Training – half day session and annually thereafter.(by March 2017)

Information Governance Training – one day session delivered 30 March 2017.

The ICT Policy has been updated to form a new ICT Acceptable Use Policy comprising:
Social Medial Policy Approved and Portable Appliance Acceptable Use Policy.

Assessment and Review:

The Information Security Policy will be subject to annual review by Senior Management, the IT Contractor and the Performance & Audit Committee.

Responsible Officer(s):

Partnership Director, Jim Grieve
Business Manager, Angela Chambers.

Element 9:	Data Protection

An organisation that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection legislation.

9.1   SEStran has a legal obligation to comply with the requirements of the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) and are committed to compliance with these Acts.

9.2   Under the Data Protection Act SEStran is a data controller and is registered as such with the Information Commissioner's office (ICO).

9.3   SEStran has a data protection policy in place as well as a detailed policy on information security.

9.4   Members of the public are made aware of their right to submit a subject access request through the Data Protection Policy published on the SEStran website.

9.5   SEStran has published a privacy notice on its website which details how personal data is used.

9.6   SEStran processes minimal personal data but recognises its obligation to protect it and remain alert to the challenges.

9.7   The Partnership Director has responsibility for Data Protection and the Business Manager will respond to any requests or queries.

Evidence:

1.   Data Protection Public Registration
       https://ico.org.uk/ESDWebPages/Entry/Z9382423 .

2.   Data Protection Policy.

3.   Information Security Policy.

4.   Information Governance Training Certificate

5.   SEStran Privacy Notice
       https://www.sestran.gov.uk/wp-content/uploads/2018/05/2018-SEStran-GDPR-Privacy-Notice-v1.0.pdf

Future Development:

There are no planned future developments for Element 9.

Assessment and Review:

The Data Protection Policy will be reviewed annually by Senior Management and the Performance & Audit Committee.

Responsible Officer(s):

Partnership Director, Jim Grieve
Business Manager, Angela Chambers

Element 10:	Business Continuity and Vital Records
A business continuity and vital records plan serves as the main resource for the preparation for, response to, and recovery from, an emergency that might affect any number of crucial functions in an organisation	

10.1   SEStran has a business continuity plan to be used in the event of any disaster or incident, to ensure that key systems and services can be recovered as soon as possible. The scope of the plan applies to the organisation as a whole.

10.2   Reference to records management arrangements, in particular vital IT applications and systems, has been included in the plan and the Information Security Policy.

10.3   In terms of business continuity, SEStran has near real time recovery and is protected by a Continuum device. The device uses snapshot and reverse chain technology to allow quick restores of individual data files and recovery of full server images. The local device can allow the recovery of files and data that are up to 6 months old. Data snapshots are taken every hour and the device allows virtualisation of the servers. In the event of a primary server failure the virtualised copy can be activated and take over the primary server role.

10.4   For disaster recovery the Continuum device sends copies of data to a secure datacenter based in the UK. Data synchronisation between the onsite device and the cloud occurs throughout the day. The cloud stores multiple point in time copies of SEStran data.

10.5   SEStran stores all vital records electronically.

Evidence:

1.   Information Security Policy.

2.   Business Continuity Plan.

Future Development:

SEStran are in the process of obtaining Cyber Essentials accreditation. **Target completion March 2019.**

Assessment and Review:

The Business Continuity Plan will be subject to annual review and testing by Senior Management.

Responsible Officer(s):

Partnership Director, Jim Grieve
Business Manager, Angela Chambers.

Element 11:   Audit Trail

An audit trail is a sequence of steps documenting the processing of a transaction flow through an organisation resulting from activities such as communications and requests by individuals, systems or other entities

11.1   All documents and records are saved on a central server and by applying the descriptive filenames, electronic records can be quickly located in the central filing system.

11.2   All members of staff are required to save a document by a name reflecting what the document is. Where dates are included in document titles these shall be saved in the following format YYYYMMDD.

11.3   To ensure the integrity of records, key documents are converted to PDF when they are finalised and moved from the working file folder to the final folder.

11.4   Paper records are referenced and maintained in the filing index and the status of each file is recorded. The Business Support Assistant is responsible for maintaining the paper filing and monitors file movement, apart from HR folders which are secured in a locked cabinet and only accessed by the Business Manager.

11.5   SEStran has been working to improve the management of its records and has introduced a document control panel on new policies and where appropriate appended versioning to document titles

Evidence:

1.   SEStran Full File Index

2.   Screen shot SEStran shared drive.

3.   Managing Records and Documents Protocol

Future Development:

Document/version control protocols will be applied to all key policies and reports as part of an ongoing improvement programme.

Assessment and Review:

Audit arrangements will be monitored and reviewed by the Business Manager.

Responsible Officer(s):

Business Manager, Angela Chambers.

Element 12: Competency Framework for Records Management Staff
A competency framework lists the core competencies and the key knowledge and skills required by a records manager. It can be used as a basis for developing job specifications, identifying training needs, and assessing performance

12.1 SEStran will provide appropriate training and development support to ensure all staff are aware of their records management responsibilities.

Evidence:

1.   Details of training/courses attended by designated officers.

2.   Business Manager Job Description and PDP.

3.   Records Management Policy.

4.   Information Governance training day proposal

5.   Security Awareness Training Proposal

Future Development:

All staff responsible for operational records management will be afforded the opportunity to attend any relevant courses, seminars or conferences as and when required.

SEStran arranged training day to cover:
- The regulatory environment and how it impacts on SEStran
- Effective document and records management for a small authority
- Potential impacts of the forthcoming General Data Protection Regulation
- Proportionate compliance with privacy and transparency duties
- Suggestions of good practice and identification of improvement actions

The above training will be delivered by 31 March 2017 and will subsequently be included as part of the staff induction.
Delivered March 2017.

Assessment and Review:

The competency framework will be reviewed annually as part of employee training and development procedures.

Responsible Officer(s):

Partnership Director, Jim Grieve
Business Manager, Angela Chambers

Element 13:	Assessment and Review

Regular assessment and review of records management systems will give an organisation a clear statement of the extent that its records management practices conform to the Records Management Plan as submitted and agreed by the Keeper

13.1   The Records Management suite of policies will form part of SEStran's Governance framework and will be subject to annual review.

13.2   The Partnership Director and Business Manager will formally review SEStran's Record Management Plan in November 2017 and annually thereafter.

13.3   Once the plan has been approved by the Keeper of the Records and has had a period of implementation, Internal Audit will be asked to include the plan in the audit cycle.

Evidence:

1.   Performance & Audit Committee minutes.

2.   Review of Governance Report

Future Development:

Assessment and review of the Records Management Plan will be reported to the Performance & Audit Committee (and, where appropriate, the Partnership).

Assessment and Review:

The Records Management policies will be monitored and subject to annual review.

Responsible Officer(s):

Partnership Director, Jim Grieve
Business Manager, Angela Chambers

Element 14: Shared Information
Under certain conditions information given in confidence may be shared. Most commonly this relates to personal information but it can also happen with confidential corporate records

14.1   The City of Edinburgh Council and Falkirk Council provide support services to SEStran by way of Service Level Agreement's for Treasury/Financial Management and HR. The types of information held by the Councils' are payroll, banking, HR advice. Anderson Strathern LLP provide legal advice to SEStran. However, as these organisations are not carrying out a function of SEStran only providing a service, Part 1 section 3.1 (b) doesn't apply. It should also be noted that each has an approved RMP.

14.2   Otherwise, SEStran does not routinely share information with other public authorities or third parties unless required to do so by legal request or by Scottish Ministers. Where such requests are made, SEStran will only share information by explicit prior consent from the data subject.

Evidence:

1.   Data Protection Policy.

2.   SLA between CEC and SEStran for Treasury Services

3.   Information Security Policy

Future Development:

The SLA's will be reviewed to ensure relevant clauses are included to comply with legislative requirements.

Assessment and Review:

The policies, agreements and procedures under this element will be subject to ongoing monitoring and annual review.

Responsible Officer(s):

Partnership Director, Jim Grieve

	EVIDENCE LIST
Element 1	1.Covering letter from the Partnership Director of SEStran 2. Records Management Policy
Element 2	(1) Covering letter from the Partnership Director of SEStran (2) Records Management Policy 3.Business Manager Job Description 4. Certificates/Records of Training
Element 3	5. Records Management Policy (2) and Guidance 6. Statement of Compliance 7. Minutes of the Partnership Board 2nd December 2016 8.Email to staff 9.Link to website http://www.sestran.gov.uk/publications/2/hr-policies/
Element 4	10.Business Classification Scheme/Retention Schedule 11.SEStran Full File Index 12.Records and IT Management Report to Partnership Board 23/09/16
Element 5	(10) Business Classification Scheme/ Retention Schedule (11) SEStran Full File Index 13.Screen shot of electronic filing/disposal log
Element 6	14.In house shredder specifications : https://www.rexeleurope.com/en/ie/5968/2102563/prostyle-12-cross-cut-shredder#.Wid82VOLS71 15.Details of Landlord's Contract with Shred-it 16.Destruction Certificate/Waste Transfer Note
Element 7	17. Memorandum of Understanding between SEStran and Edinburgh City Archives 18. Email correspondence
Element 8	19.Information Security Policy 20. Minutes of the Performance & Audit Committee and Partnership 21.Members Code of Conduct 22.SEStran Home Working Policy 23.SEStran ICT Policy 24.Draft Business Plan 2017/18
Element 9	25.Data Protection Public Registration https://ico.org.uk/ESDWebPages/Entry/Z9382423 . 26.Data Protection Policy (19) Information Security Policy
Element 10	(19) Information Security Policy 27.Business Continuity Management Plan

	EVIDENCE LIST
Element 11	(11) SEStran Full File Index
	28.Screen shot from shared network drive
Element 12	(4) Details of training/courses attended by designated officers
	29.Business Manager Job Description and PDP
	(2) Records Management Policy
	30.Information Governance training day proposal
Element 13	(20) Performance & Audit Committee Minutes
	31.Review of Governance Report
Element 14	(26)Data Protection Policy
	32.SLA between SEStran and CEC
	(19) Information Security Policy