

RECORDS MANAGEMENT PLAN

June 2017



**SHETLAND ISLANDS AREA
LICENSING BOARD**



Shetland Transport Partnership

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02/06/2017	1.1	2.0	Approved by the Keeper

Foreword

This is the Records Management Plan [RMP] for Shetland Islands Council, incorporating Shetland Islands Area Licensing Board and the Shetland Transport Partnership [ZetTrans]. It has been prepared in compliance with the requirements of the Public Records (Scotland) Act 2011 [the “PRSA”]. Shetland Islands Council takes its responsibilities for records management very seriously, and expects the RMP to provide a firm foundation from which we can make better use of our information assets.

The RMP will provide our Council with a framework in which it can manage its information assets, ensuring that the Council has data, information and knowledge, which is:

- **Useable:** information will be accurate, up to date, and fit for purpose. The Council will have the information it needs.
- **Accessible:** information will be in the right place, organised appropriately, open wherever possible, protected where required. The Council will have the information it needs, where it needs it.
- **Reliable:** the Council will have access to the information it needs, where it needs it, whenever it needs it and that appropriate business continuity arrangements are in place to protect it.

The Council defines its Information Assets as all data, information and knowledge generated, sent, received or used by it in the undertaking of its functions – whether it be delivering its services, formulating policy, holding meetings, managing budgets or monitoring projects.

Whilst the RMP describes our current practice, all of the elements within the RMP describe future planned improvements to our records and information management policies and procedures. The Information Management Strategy approved by senior management in October 2016, recognises the value of our information assets and the importance placed on their proper management throughout their lifecycle as a vital corporate function.

The Council and its senior management team are committed to ensuring the delivery of the Information Management Strategy over the next 5 years. In February 2017, the Council approved a planned Business Transformation Programme, which will support transformational service redesign projects across the Council and with community planning partners through joint strategic commissioning.

The Information Management and Improvement Programme is a critical component of the Business Transformation Programme in developing and implementing a digital culture that meets the needs of our staff, customers and citizens of the Shetland community. Programme and Project governance will ensure that sound records management is at the heart of all development work.

The Records Management Plan is a statement of our current and planned arrangements, and we commend the Records Management Plan to the Keeper of the Records of Scotland.

M Boden
Chief Executive

C Ferguson
Director of Corporate Services

J Riise
Executive Manager -
Governance and Law

Introduction

Under the Public Records (Scotland) Act 2011 (“the Act”) Scottish public authorities must produce and submit a records management plan (“the RMP”) setting out proper arrangements for the management of an authority’s public records to the Keeper of the Records of Scotland (“the Keeper”) for his agreement under section 1 of the Act.

This Records Management Plan is based on the Keeper's published Model Records Plan. The model plan has 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

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.

This Plan covers Shetland Islands Council, Shetland Islands Area Licensing Board and the Shetland Transport Partnership [ZetTrans].

For more information about the Public Records (Scotland) Act 2011, visit the website of the [National Records of Scotland](#).

For further information about this Records Management Plan, please contact:

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1 Responsibility – Senior Management Responsibility**Compulsory element****Element 1: Senior management responsibility:**

Identify an individual at senior level who has overall strategic accountability for records management.

Section 1(2)(a)(i) of the Act specifically requires a RMP to identify the individual responsible for the management of the authority's public records.

Current Position Statement –

The Director of Corporate Services has been appointed as the Senior Information Risk Owner (SIRO) and is responsible for delivering the objectives of the Information Management Strategy. This is supported through the establishment of an Information Governance Board, which has responsibility for driving the information governance agenda, supported by a team of Information Risk Owners and Administrators.

The Executive Manager – Governance and Law [Mr Jan-Robert Riise] currently acts as the proper officer for the statutory functions and obligations of the Council under all current, relevant legislation relating to Freedom of Information and Data Protection. The Executive Manager – Governance and Law also holds these responsibilities as the appointed Clerk to the Shetland Islands Area Licensing Board and, through a Minute of Agreement, as Secretary for the Shetland Transport Partnership.

Mr Jan-Robert Riise, Executive Manager – Governance and Law is the senior individual with strategic responsibility for records management within the Council.

Evidence:

- 01-1 CMT Report and minute – appointment of SIRO and establishment of Information Governance Board
- 01-2 Information Management Strategy
- 01-3 Information Governance Board - Terms of Reference
- 01-4 initial Improvement Programme
- 01-5 Job Profile: Executive Manager – Governance and Law [Jan Riise] – “Ensure the Council complies with its duties under Data Protection, Freedom of Information and other associated legislation.”
- 01-6 SIC Scheme of Delegations: Chief Legal Officer (para 18) – Proper Officer designation for all statutory functions under the legislation relating to FOISA, EIR, RIPSAs and DP.
- 01-7 Minute of Agreement/Scheme of Administration – Shetland Transport Partnership/Secretary role
- 01-8 Covering Letter from Clerk to the SIALB
- 01-9 Covering Letter from Secretary of the Shetland Transport Partnership.

Improvement Statement:

Senior management within the Council, through the Council's Corporate Management Team and the Information Governance Board, recognise the importance of records management and are responsive to projects and innovative suggestions for improvements in individual service areas. The Council's Corporate Risk Register illustrates a commitment to providing sufficient staffing, technical and organisational resources to ensure that the above requirements for dealing with

records can be achieved and maintained, but the Records Management Policy does not set out these senior management responsibilities in such detail and risk registers require review to ensure that all information risks are adequately addressed, and not only those relating to technological risks.

Information Management Strategy:Governance and Risk

We will maintain a proactive, planned, and proportionate approach to managing all council information using an approved maturity model which identifies assurance measures that will reduce risk, increase performance and provide the controls and measures where all information management disciplines are compliant. We will be confident and efficient to managing risk, that this is appropriate and balanced with our business needs, enabling staff to do their jobs whilst safeguarding information.

Improvement Programme Actions:

- 1.5 Update Records Management Policy, which sets out the responsibilities of staff throughout the organisation, and specific reference to be made to the PRSA. The Policy should be used to support the Information Management Strategy and Improvement Programme, setting out the key responsibilities for information owners to achieve.
- 1.6/1.9 A review of the terminology and focus of the Risks and Control measures within Departmental and Corporate Risk Registers is required to ensure that all aspects of Information and Records are covered.

END OF ELEMENT 1

2 Responsibility – Records Manager**Compulsory element****Element 2: Records manager responsibility:**

Identify individual within the authority, answerable to senior management, to have day-to-day operational responsibility for records management within the authority.

Current position statement:

The current Records Management Policy states as one of its aims: “Records Management is recognised as a corporate function which is related to issues such as Freedom of Information and Data Protection, and is a vital part of information management as a whole.”

Operational Responsibilities: In support of the senior management responsibilities, the operational day-to-day functions are delegated to the **Team Leader – Administration** [Mrs Anne Cogle], whose job profile includes the requirement to:

“Promote, monitor and manage the effective control of the Council’s records in relation to service and departmental procedures and practice, and ensure corporate wide compliance with the Records Management Plan and associated requirements under the Public Records (Scotland) Act 2011.”

The Team Leader – Administration is the Council’s initial point of contact for any Records Management issues.

The Team Leader is supported in this day-to-day function by administrative and business support staff throughout the organisation [identified as RM/FOISA/DP contacts, and with day-to-day support provided within Committee Services [Records Management – Rachel Macleod, Freedom of Information – Louise Adamson and Data Protection – Leisel Gair].

The Lead Officer for ZetTrans has day to day responsibility for the management of **ZetTrans** records.

The Team Leader – Legal Services has day to day responsibility for the management of **SIALB** records.

All staff within the Shetland Islands Council are responsible for ensuring that the records they create or maintain comply with the requirements of the Records Management policy.

Line Managers are generally required to:

- Familiarise themselves with, and follow, the SIC records management procedures and practices and ensure that their staff do likewise.
- Ensure that, where necessary, staff have appropriate security clearance to do their jobs effectively.
- Identify staff training needs and arrange for these to be addressed.
- For their own areas, oversee the application of the Council’s Retention and Destruction Schedule and provide input into its development.
- Undertake management and statistical reporting.
- Ensure records are held in appropriately secure conditions, depending on their classification.

Records management contact officers, office administrators and business support staff

[referred to within the RM Policy as the Liaison Group] are generally required to:

- Familiarise themselves with, and follow, the SIC records management procedures and practices.
- File items promptly and accurately.
- Identify final versions.
- Ensure records can be accessed as needed.
- Support users.
- Send information to the relevant people.
- Issue guidance and provide training.
- Monitor proper functioning of records management systems.
- Create and maintain security rights
- Ensure records management systems stay in line with developments in best practice.
- Administer the records management and registry systems
- Follow closure and disposition procedures.

Mrs Anne Cogle, Team Leader - Administration is the individual with day-to-day responsibility for records management activities on behalf of the Council, the Licensing Board and ZetTrans.

Evidence:

- 02-1 Job Profiles: Team Leader – Administration; Committee Assistant; Committee Officer; Business Support Officer; Personal Assistant and Administration Officer
- 02-2 Letter of confirmation from Secretary of ZetTrans
- 02-3 Letter of confirmation from the SIALB

Improvement Statement

There are no dedicated information or records management staff, and these supporting roles are undertaken by staff that also have responsibility for a variety of other tasks. Some references are made within job profiles and in policy to the Records Management Liaison Group, and most recently within the Records Management Strategy. The Group was originally formed to assist in the development of records management procedures, business classifications and retention and destruction schedules prior to the introduction of FOISA in 2005. Since then, the Group has not met formally, and some job profiles have changed and no longer refer to the RM function. There is recognition that information management responsibilities should be specifically referenced within job profiles, and within a refreshed Records Management Policy. The Policy should re-establish the Liaison Group, with a remit to consider the operational aspects of information governance, and to inform and support the improvement programme being led by the SIRO and the Information Governance Board.

Information Management Strategy:

Governance and Risk - We will maintain a proactive, planned, and proportionate approach to managing all council information using an approved maturity model which identifies assurance measures that will reduce risk, increase performance and provide the controls and measures where all information management disciplines are compliant. We will be confident and efficient to managing risk, that this is appropriate and balanced with our business needs, enabling staff to do their jobs whilst safeguarding information.

Improvement Programme Actions:

- 1.3 Review responsibilities assigned to existing post holders to ensure they remain appropriate

and best use of resources.

- 1.4 Include specific responsibility for information management in job profiles or person specifications for: Senior Information Asset Owners [*Directors*]; Information Asset Owners [*Executive Managers*]; and Information Asset Administrators [*Senior Admin, Personal Assistants and Business Support staff*].
- 1.5 Update Records Management Policy, which sets out the responsibilities of staff throughout the organisation, and specific reference to be made to the PRSA. The Policy should be used to support the Information Management Strategy and Improvement Programme, setting out the key responsibilities for information owners to achieve.

END OF ELEMENT 2

3 Records Management Policy Statement**Compulsory element****Element 3: Records management policy statement:**

A records management policy statement underpins effective management of an authority's records and information. It demonstrates to employees and stakeholders that managing records is important to the authority and serves as a mandate for the activities of the records manager.

The Keeper expects each authority's plan to include a records management policy statement. The policy statement should describe how the authority creates and manages authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required. The policy statement should be made available to all staff, at all levels in the authority.

Current Position Statement

The Shetland Islands Council's commitment to effective records management is set out in the corporate Records Management Policy. This is supplemented by Records Management procedural documentation, available to staff through the intranet systems [versions 1 and 2]. The Council's ICT Strategy sets out the Council's plans for improved management of its digital information, but there is no commitment yet to implementing a corporate Electronic Document Records Management System, although individual services have adopted systems to improve delivery of their services. It is considered necessary to improve the state of current records and aim to develop a corporate EDRMS Project. This element will be assessed and developed as part of the improvement programme, as it is recognised as being a key element of delivering the overall Business Transformation Programme.

Evidence

- 03-1 Records Management Policy – February 2003
- 03-2 Records Management Guidelines and Handbook - 2005
- 03-3 Records Management Intranet pages [version 1 and version 2]
- 03-4 Retention and Destruction Schedule – V11.2 - September 2015
- 03-5 ICT Strategy 2016-2021
- 03-6 Draft RM Policy 2017

Improvement Statement

Some procedural documents are regularly updated, but the overall policy requires review in order to update the terminology in light of the PRSA, developments in FOISA/EIR and DP legislation and guidance and changes in job titles. There is also a need for the Policy statement to take account of the newly adopted Information Strategy.

Information Management Strategy:

Governance and Risk - We will maintain a proactive, planned, and proportionate approach to managing all council information using an approved maturity model which identifies assurance measures that will reduce risk, increase performance and provide the controls and measures where all information management disciplines are compliant. We will be confident and efficient to managing risk, that this is appropriate and balanced with our business needs, enabling staff to do their jobs whilst safeguarding information.

Improvement Programme Actions:

- 1.5 A review and update of the Records Management Policy is required to reflect the more detailed elements required of the PRSA by bringing together the procedural documents already produced, and updating to reflect current practice, recent and future developments in relation to FOISA/EIR, RM and DP regulations and practice, as well as job titles and responsibilities, and the Information Management Strategy.

END OF ELEMENT 3

4 Business Classification**Element 4: Business classification:**

A business classification scheme describes what business activities the authority undertakes – whether alone or in partnership. The Keeper expects an authority to have properly considered business classification mechanisms and its RMP should therefore reflect the functions of the authority by means of a business classification scheme or similar.

Current Position Statement:

The Council relies on the content of the existing Retention and Destruction Schedule document as its Business Classification Scheme. The R&D Schedule was initially developed using the Local Government Business Classification scheme. Sections of the R&D Schedule have been updated as service areas have been reviewing their records management practice, although these reviews have taken place on an ad hoc and unplanned basis. All business areas have their own filing plans pertaining to their functional areas.

Evidence:

- 04-1 Retention and Destruction Schedule – latest version 11.2 - September 2015
- 04-2 Service Area File Plan Examples - A) Trading Standards B) Transport

Improvement Statement:

A review of the Retention and Destruction Schedule is required. Whilst it is understood that the LGBCS is an acceptable basis on which to build a local Business Classification Scheme, and the R&D Schedule title could be amended to reflect this, it is recognised that the business classifications have not undergone any formal review for some time, although different elements of the R&D schedules have been amended and updated as records management projects or audits have identified a need. The Scottish Council on Archives Records Retention Schedules [SCARRS] has been identified as the basis upon which the business classifications are to be reviewed, and has been used by some service areas already, and will form the framework for the reviewed R&D Schedule which is identified in the Improvement Programme.

Information Management Strategy:

Information and Records Lifecycle Management - We will provide staff with the right tools and knowledge for managing all information and records throughout their lifecycle, so that all staff know what information is available to them, why it is being held, where it is stored, who has access to it and for how long it should be retained. This will include aligning all management of our records and information with a Corporate Business Classification Scheme and Records Retention Schedule, using Service File Plans. We will find effective solutions for managing our information and records in all formats, avoiding unnecessary duplication and inefficient dependencies. This will increase the use of shared corporate repositories enabling quicker responses to Freedom of Information requests and improving what we publish, demonstrating our commitment to openness and transparency.

Improvement Programme Actions:

The Council has approved a five year Business Transformation Programme, which includes a commitment to the delivery of an Information Management Improvement Programme. A new Business Classification Scheme is a specific element of that Improvement Programme and a SMART

plan for this programme of work will be produced over the next few months. This will be carried out in conjunction with work on the Retention and Destruction Schedule.

2.1 Review and update the Retention Schedule including Business Classifications.

END OF ELEMENT 4

5 Retention Schedules

Element 5: Retention schedules

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

Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction or other disposal of the authority's public records.

Current Position Statement:

The Council's current Retention and Destruction Schedule is widely used, and is reviewed relatively frequently as services identify a need, or an internal audit report highlights an area of improvement. As stated in Element 4, the Scottish Council on Archives Records Retention Schedules [SCARRS] has been identified as the basis upon which the business classifications are to be reviewed, and will form the framework for a review of the R&D Schedule.

There are recognised gaps in the current Scheme, some of which have been highlighted by Internal Audit reports, and these will be addressed as part of the Information Management Improvement Programme.

The Council's ICT Service has detailed procedural documents pertaining to the back up of server information. In general terms, the ICT Service uses a combination of disk and tapes to store backups. Disk based backups are kept for 9 days after which time they get overwritten. Before this happens a tape backup is triggered and depending on the weekend it runs it, the tapes that it uses will have a retention period of a year or a month. After the retention period expires existing tapes are erased and re-used. Backups cover all corporate servers (this includes the Corporate and User areas (O and H drives)).

Evidence:

- 05-1 Retention and Destruction Schedule – latest version 11.2 - September 2015
- 05-2 ICT Procedures – back up procedures - redacted version

Improvement Statement:

A review of the Retention and Destruction Schedule is required. The Scottish Council on Archives Records Retention Schedules [SCARRS] has been identified as the basis upon which the business classifications are to be reviewed, and has been used by some service areas already, and will form the framework for the reviewed R&D Schedule. A data archiving solution is an element of the ICT Strategy for 2017/18.

Information Management Strategy:

Information and Records Lifecycle Management - We will provide staff with the right tools and knowledge for managing all information and records throughout their lifecycle, so that all staff know what information is available to them, why it is being held, where it is stored, who has access to it and for how long it should be retained. This will include aligning all management of our records and information with a Corporate Business Classification Scheme and Records Retention Schedule, using Service File Plans. We will find effective solutions for managing our information and records in all formats, avoiding unnecessary duplication and inefficient dependencies. This will increase the use of shared corporate repositories enabling quicker responses to Freedom of Information requests and improving what we publish, demonstrating our commitment to openness and transparency.

Improvement Programme Actions:

The Council has approved a five year Business Transformation Programme, which includes a commitment to the delivery of an Information Management Improvement Programme. An updated Retention and Destruction Schedule is a specific element of that Improvement Programme and a SMART plan for this programme of work will be produced over the next few months. This will be carried out in conjunction with work on the Business Classification Scheme and the Retention and Destruction Schedule.

2.1 Review and update the Retention Schedule including Business Classifications.

END OF ELEMENT 5

6 Destruction Arrangements**Compulsory element****Element 6: Destruction arrangements**

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

Section 1(2)(b)(iii) of the Act specifically requires a RMP to include provision about the archiving and destruction, or other disposal, of an authority's public records.

Current Position Statement:

Paper - The Council has no formal destruction policy in place. Destructions are carried out in accordance with guidance contained in the Records Management Guidelines and Handbook – 2005, the R&D Schedule, and on advice from the Team Leader – Administration or Committee Assistant. Destruction log sheets are kept in accordance with RM guidelines. In practice, the Council's Waste to Energy Plant is used for the routine destruction of large volume Council records, which is a unique and secure destruction facility. Semi-current and long term records within the Records Store at King Harald Street are managed centrally and secure destruction arrangements made with Waste Services for secure collection and destruction at the Waste to Energy Plan. Routine destructions are carried out internally using office shredders.

Electronic

There is no corporate policy for the destruction of electronic records held on shared drives, although some operational procedures exist for the deletion of records, particularly personal information, held on bespoke business systems. In terms of backups, the Council's ICT Service has detailed procedural documents pertaining to the back up of server information. In general terms, the ICT Service uses a combination of disk and tapes to store backups. Backups cover all corporate servers (this includes the Corporate and User areas (O and H drives)).

Hardware

ICT have a contract in place with COPE Ltd, with regard to the destruction of PC hardware. The agreement requires ICT to remove all hard drives before being sent for destruction. Hard drives are retained and then destroyed periodically by ICT.

Evidence:

- 06-1 Records Management Guidelines and Handbook 2005
- 06-2 Destruction Log Sheet
- 06-3 ICT hardware destruction arrangements/SLA/Contract
- 06-4 ICT Back up procedures - redacted version
- 06-5 Governance and Law office procedures for confidential files
- 06-6 Examples of information amendment/deletions from ad hoc systems

Improvement Statement:

There is a need to document our current practices, and ensure corporate consistency in terms of the procedures being followed. There is a need to establish a formal Destruction Policy and Procedures for use across the Council, and for all mediums, and that this should be done in conjunction with the review and update of a Business Classification Scheme and the Retention and Destruction Schedule.

Information Management Strategy:

Information and Records Lifecycle Management - We will provide staff with the right tools and knowledge for managing all information and records throughout their lifecycle, so that all staff know what information is available to them, why it is being held, where it is stored, who has access to it and for how long it should be retained. This will include aligning all management of our records and information with a Corporate Business Classification Scheme and Records Retention Schedule, using Service File Plans. We will find effective solutions for managing our information and records in all formats, avoiding unnecessary duplication and inefficient dependencies. This will increase the use of shared corporate repositories enabling quicker responses to Freedom of Information requests and improving what we publish, demonstrating our commitment to openness and transparency.

Improvement Programme Actions:

The Council has approved a five year Business Transformation Programme, which includes a commitment to the delivery of an Information Management Improvement Programme. Updated destruction arrangements are a specific element of that Improvement Programme and a SMART plan for this programme of work will be produced over the next few months. This will be carried out in conjunction with work on the Business Classification Scheme and the Retention and Destruction Schedule.

- 2.2 Produce Destruction of Records Policy and Procedures, which aligns with the Business Classification and Retention and Destruction Schedule.

END OF ELEMENT 6

7 Archiving and transfer arrangements**Compulsory element****Element 7: Archiving and transfer arrangements**

Section 1(2)(b)(iii) of the Act specifically requires a RMP to make provision about the archiving and destruction, or other disposal, of an authority's public records.

Current Position Statement:

Shetland Museum and Archives is operated by Shetland Amenity Trust which is a charitable public trust set up to preserve and enhance everything that is distinctive about Shetland's cultural and natural heritage, whilst promoting access to it, whether physically or intellectually. The Council's Retention Schedule identifies records to be archived and such records are transferred to Shetland Archives using agreed procedures.

Shetland Islands Council deposits archival records in Shetland Museum and Archives in accordance with a formal Minute of Agreement, and has a good working relationship with the Shetland Archivist and his team who have helped the Council in developing records management storage and archiving through the Council over many years, and this is continuing in the development of new procedures.

Semi-current and long term records are currently held in premises in King Harald Street. New premises have been identified and guidance on its specification has been drawn up using guidance from the National Archives document "Identifying and specifying requirements for offsite storage of physical records". Officers are in the process of reviewing files in King Harald Street and updating the information asset database with the records held, in readiness for the move to the new premises in 2017. The Archivist has been involved in reviewing files being held, and those destined for destruction, to ensure that any files of significant historical value are identified.

Evidence:

- 07-1 Museum and Archives Minute of Agreement - relevant extracts
- 07-2 Transfer forms to Shetland Archives
- 07-3 Shetland Museum and Archives – extract from catalogue of collections held - also available on internet
<http://www.shetlandmuseumandarchives.org.uk/collections/archive>
<http://www.shetlandmuseumandarchives.org.uk/collections/archive/local-government>
<http://www.calmview.eu/ShetlandArchive/CalmView/>
- 07-4 Transfer Procedure for Archival Records to the Shetland Archives - V4.0 August 2015
- 07-5 Transfer Procedure for Semi-current and Non-current Records to the King Harald Street records store – v4.0 April 2011
- 07-6 Transfer Procedure to secure Social Work records room, King Harald Street records store – v1.0 June 2014

Improvement Statement:

Whilst there is evidence of some documented procedures being in place, it is, however, recognised that a formal Archives Transfer Policy is required, and this is in draft, following discussions with the Archivist, and using a template provided by Falkirk Council. It will be necessary for the reviewed Retention and Destruction Schedule to take account of the Archive Transfer Policy and to ensure

that the procedures align. There is a further need to be mindful of the form in which data and records are held now, and into the future, and preservation of our information requires to be addressed.

Information Management Strategy

Information Preservation - We will we have clear and consistent, policy and procedures for identifying when council information requires to be transferred and preserved permanently, based on the completeness of the archive record and not the medium in which it is held. We will make sure that we secure this information for future generations by working toward compliance with relevant standards for the storage and curation of both physical and digital archival materials.

Improvement Programme Actions:

- 3.1 Produce Archives Transfer Policy.
- 3.2 Develop Information Preservation Policy for long term and archive records.
- 3.3 Produce digital migration and preservation policy and procedures.

END OF ELEMENT 7

8. Information Security**Compulsory element****Element 8: Information security**

Information security is the process by which an authority protects its records and ensures they remain available. It is the means by which an authority guards against unauthorised access and provides for the integrity of the records. Robust information security measures are an acknowledgement that records represent a risk as well as an asset. A public authority should have procedures in place to assess and contain that risk.

Section 1(2)(b)(ii) of the Act specifically requires a RMP to make provision about the archiving and destruction or other disposal of the authority's public records.

Current Position Statement:

The Council has a comprehensive ICT security Policy which covers all records held electronically by the Council's servers and systems. The ICT Management Teams ensure that security matters are given a high priority, and there are specific procedures in place for the operation of the mobile CCTV unit for community surveillance. Ad hoc audits of premises CCTV within departments are undertaken, and all operators and advisors are made aware of the current ICO guidance. The Council has procedures in place for ensuring the secure transfer and storage of its long term records, and the transfer for preservation of its historical records, and the Shetland Museum and Archives maintains its own Archiving Policy, which is applied to Council records, evidenced under Element 7. The ICT Security Policy is accessible to staff on the intranet, and reminders about the policy are given at every login screen.

Evidence:

- 08-1 ICT Security Policy
- 08-2 CCTV mobile unit procedures
- 08-3 Corporate Risk Register - August 2016
- 08-4 Intranet Screenshot
- 08-5 Login Screenshot

Improvement Statement:

Whilst there are a range of policies and procedures in place relating to the security of electronic information, there is no comprehensive policy or procedure in relation to the security of non-electronic information. Such matters are dealt with at an office level and security arrangements put in place, perhaps following an audit, or under guidance from Risk Management or Health and Safety Officers. It is recognised that a cohesive approach to wider information management is required, inclusion with risk registers, and a planned approach to breaches of any information security is also a recognised area of improvement.

Information Management Strategy

Information Security and Systems Management - We will work to ensure that our information management and information technology requirements are aligned and that information management needs are a key factor in the making of IT decisions. This will encompass the business specification and design of new systems, the implementation and management of systems; the management of legacy systems and data migration; and the secure disposal of information and IT equipment. New approaches to technology will have implications for how we manage and protect our information. In working to address these, we must focus on the information and content within systems, the physical and virtual spaces these are held, and not the technology alone.

Improvement Programme Actions:

The Council has approved a five year Business Transformation Programme, which includes a commitment to the delivery of an Information Management Improvement Programme. Arrangements for ensuring a comprehensive approach to all information security is a specific element of that Improvement Programme and a SMART plan for this programme of work will be produced over the next few months.

- 4.1 Produce Information Security Policy
- 4.2 Produce Information Security Breach Reporting Procedures.
- 4.3 Develop procedures to ensure that all information management functionality and strategic requirements are key considerations of: PRINCE2 projects, business cases, new or revised policy and procedures, system design, data migration, new approaches and innovations, and ensure alignment with the current ICT Strategy.

END OF ELEMENT 8

9. Data Protection Policy**Element 9: Data protection**

An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.

The Keeper will expect an authority's RMP to indicate compliance with its data protection obligations. This might be a high level statement of public responsibility and fair processing. If an authority holds and process information about stakeholders, clients, employees or suppliers, it is legally obliged to protect that information. Under the Data Protection Act, an authority must only collect information needed for a specific business purpose, it must keep it secure and ensure it remains relevant and up to date. The authority must also only hold as much information as is needed for business purposes and only for as long as it is needed. The person who is the subject of the information must be afforded access to it on request.

Current Position Statement:

The Council is registered with the Information Commissioners Office (ICO) - **Z6143805**
 Shetland Islands Area Licensing Board is registered with the ICO - **ZA089994**
 Shetland Transport Partnership (ZetTrans) is registered with the ICO - **Z9487081**

The Executive Manager – Governance and Law has corporate responsibility [named Data Controller contact] for compliance with data protection legislation assigned to him under the Council's Corporate Risk Register.

Compliance with data protection obligations has been a significant area of improvement for the Council over a number years and data protection awareness across all areas of the Council is considered to be at a very high level. Project management, particularly through ICT projects, have understood the need to assess the impact on personal information using a template devised from the ICO guidelines.

DP Training is available on the Council's iLearn platform, and this received a high increase in numbers following a visit from the Assistant Commissioner and his staff in September 2015. A two day conference and workshop programme was organised and attended by staff at all levels, and increased awareness considerably of the need for compliance.

DP contacts are established in each department and assist with the collation of information for Subject Access Requests.

Evidence:

- 09-1 Data Protection Policy
- 09-2 ICT Security Policy
- 09-3 Subject Access Procedures
- 09-4 Privacy Impact Assessment template
- 09-5 DP Brightwave Training - iLearn screenshots
- 09-6 ICO visit September 2015 – programme
- 09-7 Intranet Screenshot of DP Policy

Improvement Statement:

Whilst the Council considers itself to be compliant with the legislation and has appropriate

procedures in place, corporate policies are outdated and require review. Formal procedure documents are required for established practice, such as breach management and reporting.

Information Management Strategy

Governance and Risk - We will maintain a proactive, planned, and proportionate approach to managing all council information using an approved maturity model which identifies assurance measures that will reduce risk, increase performance and provide the controls and measures where all information management disciplines are compliant. We will be confident and efficient to managing risk, that this is appropriate and balanced with our business needs, enabling staff to do their jobs whilst safeguarding information.

Improvement Programme Actions:

- 1.8 Review of DP Policy
- 4.2 Breach reporting and management Procedures.

END OF ELEMENT 9

10. Business Continuity Plan and Vital Records**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 authority.

The Keeper will expect an authority's RMP to indicate arrangements in support of records vital to business continuity. Certain records held by authorities are vital to their function. These might include insurance details, current contract information, master personnel files, case files, etc. The RMP will support reasonable procedures for these records to be accessible in the event of an emergency affecting their premises or systems.

Authorities should therefore have appropriate business continuity plans ensuring that the critical business activities referred to in their vital records will be able to continue in the event of a disaster. How each authority does this is for them to determine in light of their business needs, but the plan should point to it.

Current Position:

All service areas within the Council have Business Continuity Plans in place. Regular reviews are undertaken, and training and support is provided through the Council's Emergency Planning and Resilience Service. Records management guidance includes a vital records "decision tree" which helps officers to identify those records that are vital to their operation, and a section of the BCP has recently been introduced to help services focus more on their vital records whether paper or electronic. The Council has a lead role in emergency planning within the Shetland Islands Area and works along with our community planning partners in developing and implementing business continuity planning, and a number of resources are available on the Council's website. The Council has engaged Plan B Consulting Ltd over a number of years to deliver advice and training on business continuity planning, and training during the early part of 2016 was focussed on the importance of vital records and this aspect is beginning to feature more regularly in reviews of current plans.

Evidence:

- 10-1 Business continuity advice - <http://www.shetlandcontinuity.co.uk/>
- 10-2 Business Continuity Management - reports to Council - 2011
- 10-3 BCP Training slides [specific to vital records]
- 10-4 Vital Records Decision tree
- 10-5 Recovery Plan - vital records section
- 10-6 BCP for Economic Development Service

Improvement Statement:

Information Management Strategy:

Business Continuity and Disaster Recovery - We will work to create procedures for the identification of vital records and ensure that vital information is identified in all Business Continuity and Disaster Recovery Plans, and that such information is appropriately stored and is accessible. This will ensure that vital information is both suitably protected and readily accessible even in times of crisis

Improvement Programme Actions:

- 5.1 Develop processes and disaster recovery procedures to ensure the identification of vital records, and inclusion in all Business Continuity Plans.
- 5.2 Develop processes to ensure document and information recovery forms part of the preparations for emergency/crisis planning and review of past events.

END OF ELEMENT 10

11. Audit Trail**Element 11: Audit trail**

An audit trail is a sequence of steps documenting the movement and/or editing of a record resulting from activities by individuals, systems or other entities.

The Keeper will expect an authority's RMP to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record. For the purpose of this plan 'changes' can be taken to include movement of a record even if the information content is unaffected. Audit trail information must be kept for at least as long as the record to which it relates.

Current Position Statement:

At present, the Council has no formal policy in terms of location systems or version control. Document control is on an ad-hoc basis, and some bespoke IT systems have built in audit functions which can produce audit reports, either routinely or on demand. Most departments operate a file tracking card system for paper files. Version control is not routinely embedded into current practice, and a corporate file naming convention would benefit services in locating corporate information. MS SharePoint is the basis on which the internal intranet is to be developed, and is currently used by some services for document control.

Evidence:

- 11-1 Governance and Law Service records management procedures
- 11-2 Intranet/SharePoint site - constitutional documents and Service plans
- 11-3 Procedures for Licensing Board applications

Improvement Statement:

The Council recognises this as a significant area of improvement which is included within the Improvement Programme.

Information Management Strategy

2.0 Information and Records Lifecycle Management - We will provide staff with the right tools and knowledge for managing all information and records throughout their lifecycle, so that all staff know what information is available to them, why it is being held, where it is stored, who has access to it and for how long it should be retained. This will include aligning all management of our records and information with a Corporate Business Classification Scheme and Records Retention Schedule, using Service File Plans. We will find effective solutions for managing our information and records in all formats, avoiding unnecessary duplication and inefficient dependencies. This will increase the use of shared corporate repositories enabling quicker responses to Freedom of Information requests and improving what we publish, demonstrating our commitment to openness and transparency.

Improvement Programme Actions:

The Council has approved a five year Business Transformation Programme, which includes a commitment to the delivery of an Information Management Improvement Programme. The development of corporate procedures for the tracking of records is a specific element of that Improvement Programme and a SMART plan for this programme of work will be produced over the next few months.

RECORDS MANAGEMENT PLAN

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- 2.3 Departmental review of service file plans to link with business classifications
- 2.4 Produce Corporate policy and procedures for file naming conventions, file tracking and version controls.
- 2.5 Develop Strategy for the introduction of a corporate Electronic Document Records Management Solution.

END OF ELEMENT 11

12. Competency framework for records management staff**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.

The Keeper will expect an authority's RMP to detail a competency framework for person(s) designated as responsible for the day-to-day operation of activities described in the elements in the authority's RMP. It is important that authorities understand that records management is best implemented by a person or persons possessing the relevant skills.

Current Position Statement:

The Council's current competency framework for all staff includes the following core competency - Using and Managing Resources Efficiently and Effectively: Demonstrate the effective and efficient use of the full range of resources used in and by the Council including time, finances, staffing, equipment, information, materials, buildings, etc. The Council is committed to the training and development of its staff, and every employee is subjected to an Employee Review and Development assessment each year, and competencies are assessed in terms of any training or developmental needs required.

The Team Leader Administration and the Committee Assistant keep abreast of information and records management issues through the Council's membership of the Information and Records Management Society and membership of the Society of Local Authority Lawyers and Administrators in Scotland (SOLAR).

All staff within the Council have access to online training in Data Protection and Freedom of Information.

The current Records Management Policy also includes a commitment to training staff, and this will be reviewed as part of the improvement programme by ensuring records management skills are recognised as core competency, especially for those with specific record management roles.

Evidence:

- 12-1 Staff Development Policy
- 12-2 Employee Review and Development Policy
- 12-3 Competency Framework: Using and Managing Resources Efficiently and Effectively
- 12-4 Brightwave Training certificates
- 12-5 Records Management Policy

Improvement Statement:

It is necessary for the Council to have in place specific information management roles across each department, and at the corporate centre, and to ensure that those postholders undertake regular assessment, training and development. The improvement programme will aim to ensure that management skills are recognised as a core competency, especially for those with specific record management roles.

Information Management Strategy

Culture and Training - We will work to create an environment where information management skills are recognised and valued in the same way that management, communication, project management and financial skills are; where good information management skills are seen as core skills required by all council staff; and work towards recognising information management skills and behaviours in the performance management process. Similarly, poor information management skills or behaviours will be monitored and training needs identified.

Improvement Programme Actions:

Improvement Statement - The Council has approved a five year Business Transformation Programme, which includes a commitment to the delivery of an Information Management Improvement Programme. The development of the competency framework and training is included as a specific element of that Improvement Programme and a SMART plan for this programme of work will be produced over the next few months.

- 6.1 Ensure that information management skills are recognised and valued as a core competency for all staff and develop a Competency Framework for specific information management roles.
- 6.2 Develop a programme of Information Governance training, to form part of mandatory induction and core development for all staff, including monitoring and identifying training needs.

END OF ELEMENT 12

13. Assessment and Review**Element 13: Assessment and review**

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

Section 1(5)(i)(a) of the Act says that an authority must keep its RMP under review.

An authority's RMP must describe the procedures in place to regularly review it in the future.

Current Position Statement:

There is currently no systematic assessment or review of records management systems, but an assessment of the suitability or compliance with records management guidelines are conducted on an ad hoc basis, as the need arises, or new systems or processes are required. Often reviews are required as a result of an issue through Internal Audit reviews on the operation of a particular function or service, and raises issues such as non-compliance with the current retention period, which results in a review of that part of the Schedule and how records are to be managed in future. In preparation for the RMP, and for commencing reviews of FOISA procedures and other aspects of the improvement programme, a number of self assessments were carried out using questionnaires provided by The National Archives and the Scottish Information Commissioner.

The Council's Performance Management Section monitor progress and performance centrally, and departments report on a quarterly basis as to their performance in terms of FOISA responses or any other issues that have been given a corporate priority and timescale.

The Records Management Plan will be reviewed on an annual basis, or more often as required, particularly as elements under the Business Transformation Programme and the Information Management and Improvement Programmes progress. This will be managed by the Executive Manager - Governance and Law, and directed through the Information Governance Board and reported to Council as part of the overall Performance and Improvement Framework.

Evidence:

- 13-1 Internal Audit reports - summary of records management issues
- 13-2 TNA questionnaire - summary of audit
- 13-3 Information Management Strategy V1.0
- 13-4 Information Management Improvement Programme - V0.1

Improvement Statement:

The Information Management Strategy and Improvement Programme recognises that a regular and formal assessment and review of information and records management compliance is required, and that agreed industry standard maturity models should be used as the basis for assessment.

The Information Governance Board will be responsible for driving the work required across the Council in order to meet the requirements of the Improvement Programme.

Information Management Strategy

Governance and Risk - We will maintain a proactive, planned, and proportionate approach to managing all council information using an approved maturity model which identifies assurance

measures that will reduce risk, increase performance and provide the controls and measures where all information management disciplines are compliant. We will be confident and efficient to managing risk, that this is appropriate and balanced with our business needs, enabling staff to do their jobs whilst safeguarding information.

Improvement Programme Actions:

The Council has approved a five year Business Transformation Programme, which includes a commitment to the delivery of an Information Management Improvement Programme. The development of a formal audit and assessment process is included as a specific element of that Improvement Programme and a SMART plan for this programme of work will be produced over the next few months. This work will be developed with the assistance of the Council's Chief Internal Auditor, and assurances on the RMP will be given the same status as other governance assurances that the Internal Audit Service provides, e.g. financial accounting and procedures and decision-making processes.

- 1.7 Develop processes for the routine audit and assessment of information governance compliance using an approved assessment framework and maturity model.

END OF ELEMENT 13

14. Shared Information**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.

The Keeper will expect an authority's RMP to reflect its procedures for sharing information.

Authorities who share, or are planning to share, information must provide evidence that they have considered the implications of information sharing on good records management.

Current Position Statement:

The need to share data within and between organisations has long been recognised in Shetland. The Shetland Data Sharing Policy (the Policy) has been developed to provide an agreed framework for the legitimate, secure and confidential sharing of personal data within and between community planning partner organisations in Shetland. Where there is a need to share data with non-Partner Organisations, the terms of the Policy should be applied. The Information Commissioner's Data Sharing Code of Practice provides important guidance on data sharing and how to comply with the Data Protection Act 1998. The Policy puts the principles and recommendations within the Code of Practice into a local context. Therefore, anyone using the Policy must also read the Code of Practice. The Policy provides a template for producing Individual Sharing Procedures, and a number of Procedures are in place and procedures continue to be developed across community planning partners for new initiatives and to improve services to clients and patients. Many of the Procedures relate to the sharing of Health and Social Care information, and the development of procedures and practice has been assisted through the local Data Sharing Partnership, whose membership consists of representation from all community planning partnerships.

Outwith the Data Sharing Partnership, there are information sharing procedures or data processing agreements in place between the Council and Scottish Government Departments [e.g. Transport (blue badges), and Education (pupil data/SEEMIS)].

Any new policies and procedures which involve processing personal information undergo a Privacy Impact Assessment to determine the impact on security, information sharing, etc, and the extent to which any further controls are required. The PIA is based on the template and guidance provided by the ICO and there are plans to introduce the PIA as a standard form within project documentation.

It is recognised that the Shetland Information Sharing Policy is concerned mainly with sharing personal information outwith the Council. Procedure or guidance would need to be developed so that staff are clear on the rules around sharing information within the Council, and to cover the sharing of confidential, non-personal information.

Evidence:

- 14-1 Shetland Data Sharing Policy
- 14-2 Information Sharing Procedures - example - Common Housing Register
- 14-3 Privacy Impact Assessments - example - Shetland Learning Partnership
- 14-4 Data Sharing Partnership – remit
- 14-5 Data Sharing Partnership meeting - December 2015
- 14-6 Shetland Data Sharing Policy Addendum 2013

Improvement Statement:

There is a need for the Council to consider the procedures that need to be put in place for the sharing of non-personal information and records which may be of a confidential nature, such as information which has been classed as exempt under Freedom of Information legislation or local government legislation pertaining to committee papers.

In all cases, information sharing procedures should separate the provisions required to permit the sharing of information between services and departments within the Council, and sharing outwith the Council, including physical and technical security requirements – see Element 8. The Council also has a commitment to ensuring that information is accessible to the wider public, and specific element of the Information Management Strategy is devoted to ensuring that the value of its information assets are maximised.

Information Management Strategy:

Knowledge, Re-use and Performance - We will work to ensure that we have the right framework and tools in place to capture and marshal organisational knowledge. Information and knowledge are key corporate assets and we all have a responsibility to share and re-use them to release their value and maximise benefits to the business and the public. Data held by us should be open to re-use unless there is a good reason not to. It is essential that we communicate to staff that the protection and sharing of information are not opposing principles. We work to ensure that the organisation has accurate and good quality information to support both intelligent decision-making and performance improvement.

Improvement Programme Actions:

- 7.1 Developing a framework and procedures for measuring, capturing, developing, sharing, and effectively using organisational knowledge and information.
- 7.2 Produce Corporate FOISA procedures – how we process requests and publish information provided in response to requests.
- 7.3 Review Publication Scheme – review how and what information we need to routinely create and publish.
- 7.4 Produce Open Data Publication Plan, and Implementation Plan.
- 7.5 Develop processes and systems to ensure that information and organisational knowledge is available to support and evidence decision making and performance improvement.
- 7.6 Develop policy and procedures for the sharing of non-personal information

END OF ELEMENT 14

15. Shared Information**Current Position Statement:**

The Shetland Islands Council contracts out some of its functions under contract or agreement to other organisations, such as service delivery partners and third party contractors. Current service level agreements and contract documents refer specifically to requirements of the Data Protection Act 1998 and the Freedom of Information (Scotland) Act 2002, ensuring that the Council's obligations understood by service providers.

Evidence:

15-1 Contract Template

Improvement Statement:

The Council recognises that it needs to specifically address scenarios where such organisations will create or manage public records, and assessments should be carried out at the procurement stage. The Improvement Programme will have this work included, to specifically require new documentation to include an assessment of records management capability as part of the procurement process. Agreements and contracts will be made or amended to include appropriate clauses relating to the management of the public records which the partner or contractor (or its own subcontractor chain) creates and/or manages on behalf of the Council, including procedures for the transfer of Council records once the contract has ended. A SMART plan for this programme of work will be produced over the next few months.

END OF ELEMENT 15

END OF RMP