

Scottish Information Commissioner
Records Management Plan



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Covering Statement

This Plan has been put in place to meet the requirements of the Public Records (Scotland) Act 2011.

I recognise the value of our records as a corporate asset, and records management as a key corporate function. Our records are our corporate memory providing evidence of actions and decisions, and supporting our daily functions and operations.

Information and records management underpins all that we do, and it features strongly in our annual operational planning. Under our governance arrangements, an annual assurance report on records management is produced.

I and the organisation are committed to ensuring that:

- our policies, procedures and practices are implemented and that they are effective
- we routinely review and develop as necessary our policies, procedures and practices
- all staff maintain, and develop as necessary, their competence in information and records management

I recognise that there is always scope to improve and develop what we do and how we do it. We are committed to continuous improvement and we actively review our key documents, including those relating to information and records management.

This Plan includes some future developments which, once in place, will further enable us to deliver improvements in business efficiency, helping us to carry out our statutory functions and to comply with legislative requirements.

Rosemary Agnew
Scottish Information Commissioner

January 2014



Element 1: Senior Management Responsibility

Introduction	<p>A compulsory element of the Public Records (Scotland) Act 2011.</p> <p>This element must identify the person at senior level who has overall strategic responsibility for records management within the organisation.</p>
Statement of Compliance	<p>The senior person who has overall strategic responsibility for records management is Rosemary Agnew, the Scottish Information Commissioner.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 1 comprises:</p> <ul style="list-style-type: none">• The Covering Statement which forms part of this document• Information and Records Management Policy
Future Developments	<p>There are no planned future developments in respect of Element 1.</p>



Element 2: Records Manager Responsibility

Introduction	<p>A compulsory element of the Public Records (Scotland) Act 2011.</p> <p>This element must identify the individual within the organisation, answerable to senior management, to have day-to-day responsibility for records management within the organisation</p>
Statement of Compliance	<p>The senior manager with operational responsibility for records management is David Lowrie, Head of Operational Management</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 2 comprises:</p> <ul style="list-style-type: none">• The Covering Statement which forms part of this document• Information and Records Management Policy• Information and Records Management Handbook
Future Developments	<p>There are no planned future developments in respect of Element 2.</p>



Element 3: Records Management Policy Statement

Introduction	<p>A compulsory element of the Public Records (Scotland) Act 2011.</p> <p>This element must describe how the organisation creates and manages authentic, reliable and usable records, capable of supporting business functions and activities for as long as they are required.</p>
Statement of Compliance	<p>The Scottish Information Commissioner recognises the value of our records as a corporate asset, and records management as a key corporate function.</p> <p>Our commitment and overall approach are set out in the Information and Records Management Policy.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 3 comprises:</p> <ul style="list-style-type: none">• Information and Records Management Policy
Future Developments	<p>There are no planned future developments in respect of Element 3.</p>



Element 4: Business Classification

Introduction	<p>The Keeper expects an organisation to have properly considered business classification mechanisms.</p> <p>A business classification scheme allows an organisation to map its functions and provides a structure for operating a disposal schedule effectively.</p>
Statement of Compliance	<p>The Scottish Information Commissioner maintains a File Plan (Business Classification Scheme) which provides a framework for a consistent approach to classifying all records across the organisation regardless of format or physical location.</p> <p>The File Plan, in conjunction with the Retention Schedule, is used to identify and retrieve records relating to the same function and activity anywhere in the organisation, irrespective of which department produces or receives them.</p> <p>The File Plan is structured in a three-tier hierarchy representing business functions, activities and sub-activities carried out within the function.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 4 comprises:</p> <ul style="list-style-type: none">• File Plan and Retention Schedule
Future Developments	<p>There are no planned future developments in respect of Element 4.</p>



Element 5: Retention Schedules

Introduction	<p>The Public Records (Scotland) Act 2011 requires a RMP to include provision about the archiving and destruction of an authority's public records.</p> <p>A retention schedule is a list of records for which pre-determined destruction dates have been established.</p> <p>The principal reasons for creating retention schedules are:</p> <ul style="list-style-type: none">• to ensure records are kept for as long as they are needed and then disposed of appropriately• to ensure all legitimate considerations and future uses are considered in reaching the final decision.• to provide clarity as to which records are still held by an authority and which have been deliberately destroyed.
Statement of Compliance	<p>The Scottish Information Commissioner maintains a Retention Schedule which:</p> <ul style="list-style-type: none">• promotes control over the organisation's records;• protects vital information, which the organisation needs in order to function effectively;• provides clear guidance on the retention and disposal of specific and general categories of information;• enables the confident disposal of records which are no longer needed;• ensures information which is subject to Freedom of Information and Data Protection legislation will be available when required;• ensures the organisation is not maintaining and storing information unnecessarily;• ensures the retention of the minimum volume of records consistent with economy and efficiency and effectiveness. <p>The retention periods are determined by legal, statutory and business requirements.</p> <p>The Retention Schedule ensures that the same types of records are managed consistently no matter where the record is held, or who created it.</p>



Evidence of Compliance	Evidence submitted in support of Element 5 comprises: <ul style="list-style-type: none">• Information and Records Management Policy• Information and Records Management Handbook• Records Review Procedures• File Plan and Retention Schedule
Future Developments	There are no planned future developments in respect of Element 5.



Element 6: Destruction Arrangements

Introduction	<p>A compulsory element of the Public Records (Scotland) Act 2011.</p> <p>Clear destruction arrangements detailing the correct procedures to follow when destroying business information. They are necessary in order to minimise the risk of an information security incident and ensure that the organisation meets its obligations in relation to the effective management of its records, throughout their lifecycle.</p>
Statement of Compliance	<p>The Scottish Information Commissioner's Information and Records Management Handbook sets out our approach to the disposal of records.</p> <p>The Records Review Procedures provide detailed guidance on the steps to be taken to dispose of records. These cover the various software packages used by the SIC and paper records.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 6 comprises:</p> <ul style="list-style-type: none">• Information and Records Management Handbook• Records Review Procedures• Information and Records Management Policy• File Plan and Retention Schedule• Certificate of Destruction – paper records (sample)
Future Developments	<p>The current records review arrangements for our contact management software package are ad-hoc; we maintain the information as we create and amend content. We are reviewing our procedures and revised arrangements will be developed by 31 March 2014, and implemented in line with our annual review schedule thereafter.</p> <p>We introduced a human resources software package on 1 September 2013. This new package contains some records that were previously held in other systems. As this is a new package, records management procedures will be developed to incorporate it into our current HR records management arrangements. This will be implemented during the next scheduled review of Operational Management records (Quarter 3, commencing 1 October 2014).</p>



Element 7: Archiving and Transfer Arrangements

Introduction	<p>A compulsory element of the Public Records (Scotland) Act 2011.</p> <p>This element must describe the mechanism by which an authority transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions.</p>
Statement of Compliance	<p>There is a Memorandum of Understanding between the Keeper of the Records of Scotland and the Scottish Information Commissioner.</p> <p>This sets out how the process of depositing, storing and accessing records of enduring historical, cultural and research value which have been transferred from the Scottish Information Commissioner to the National Records of Scotland will operate.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 7 comprises:</p> <ul style="list-style-type: none">• Memorandum of Understanding between the Keeper and SIC
Future Developments	<p>The Scottish Information Commissioner was established in 2003. To date, records have been identified which we anticipate it will be appropriate to transfer to the NRS in the future.</p> <p>Internal procedures will be established in conjunction with the Keeper at the appropriate time.</p> <p>Where electronic records are identified for permanent preservation the SIC will work with NRS in order to fulfil the requirements of the NRS Deposit Agreement for Electronic Records.</p>



Element 8: Information Security

Introduction	<p>A compulsory element of the Public Records (Scotland) Act 2011.</p> <p>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. An authority should have procedures in place to assess and contain that risk.</p>
Statement of Compliance	<p>The Scottish Information Commissioner recognises that information is a valuable asset and that business continuity is dependent on its integrity and continued availability. Therefore, steps are taken to protect information assets from unauthorised use, modification, disclosure or destruction, whether accidental or intentional.</p> <p>The SIC is committed to the secure use of information and information technology systems in order to protect the availability, integrity and confidentiality of the information under our control. The SIC has in place procedures to protect the information under our control.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 8 comprises:</p> <ul style="list-style-type: none">• Information and Records Management Policy• Information and Records Management Handbook• Employee Handbook (extract)• Risk Register (extract)• Staff Manual (Clear Desk Policy) (extract)• Investigations Procedures (extract)• Certificate of Destruction – IT (sample)
Future Developments	<p>There are no planned future developments in respect of Element 8.</p>



Element 9: Data Protection

Introduction	<p>An authority that handles personal information about individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.</p> <p>The Keeper expects an authority's RMP to indicate compliance with its data protection obligations.</p>
Statement of Compliance	<p>The Scottish Information Commissioner complies with the obligations placed upon us by the Data Protection Act 1998.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 9 comprises:</p> <ul style="list-style-type: none">• Data Protection Policy• Employee Handbook (extract)• Enquiries Procedures (extract) <p>The SIC's Registration Reference with the Information Commissioner's Office is Z8091699</p>
Future Developments	<p>SIC is currently reviewing our data protection procedures. The review will be completed by 31 March 2014 and any changes arising from the review will be implemented thereafter.</p>



Element 10: Business Continuity and Vital Records

Introduction	<p>It is recommended that a Business Continuity and Vital Records Plan is in place in order to ensure that key records and systems are protected and made available as soon as possible in the event of, and following, an emergency. The plan should identify the measures in place to prepare for, respond to and recover from such an emergency.</p>
Statement of Compliance	<p>The Scottish Information Commissioner maintains a comprehensive Business Continuity Plan which allows the organisation to recover quickly in the event that we experience the loss of access to our office for an extended period.</p> <p>The Plan includes detailed a detailed IT recovery plan which is tested annually by our IT support provider. The most recent test confirmed full functionality, including access to all electronic records, can be achieved within 48 hours of implementation of the plan.</p> <p>The Plan is the sole vital record which the SIC needs to recover operations.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 10 comprises:</p> <ul style="list-style-type: none">• Business Continuity Plan (extract)
Future Developments	<p>There are no planned future developments in respect of Element 10.</p>



Element 11: Audit Trail

Introduction	<p>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.</p> <p>The Keeper expects an authority's records management system to provide evidence that the authority maintains a complete and accurate representation of all changes that occur in relation to a particular record.</p>
Statement of Compliance	<p>The Scottish Information Commissioner has systems and procedures in place to ensure an audit trail exists for the editing, movement and destruction of our records.</p> <p>SIC's principal electronic record management systems – INVU (corporate records) and Workpro (casework records) – incorporate full audit trails, incorporating version control and in which the rights to view, edit and delete records are set to reflect organisational policies and procedures.</p> <p>ACT!, a contact management system which holds limited personal data, provides audit trail functionality commensurate with its function as a repository for non – casework related day to day records of communication.</p> <p>Simply Personnel, an HR administration system, maintains a record of changes to, for example, leave records.</p> <p>Procedures are in place for the selection and disposal of paper records.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 11 comprises:</p> <ul style="list-style-type: none">• Information & Records Management Policy• Information & Records Management Handbook• Records Review Procedures• INVU destruction log sample (extract)• Paper destruction log sample (extract)
Future Developments	<p>The current records review arrangements for our contact management software package are ad-hoc; we maintain the information as we create and amend content. We are reviewing our</p>



procedures and revised arrangements will be developed by 31 March 2014, and implemented in line with our annual review schedule thereafter.

We introduced a human resources software package on 1 September 2013. This new package contains some records that were previously held in other systems. As this is a new package, records management procedures will be developed to incorporate it into our current HR records management arrangements. This will be implemented during the next scheduled review of Operational Management records (Quarter 3, commencing 1 October 2014).



Element 12: Competency Framework for Records Management Staff

Introduction	This element describes the role of a competency framework in demonstrating what the organisation considers are the vital skills and experiences needed by records management staff.
Statement of Compliance	<p>SIC is a small public authority, comprising around 25 staff located in a single office. Accordingly, a dedicated records management post is not necessary or justifiable.</p> <p>Records management forms part of the Head of Operational Management's (HOOM) responsibilities. The HOOM is supported by an Administrator with specific records management duties, and there is a Records Management Team which comprises staff from each functional team.</p> <p>The HOOM's job description specifies the records management responsibilities, and the Information and Records Management Handbook sets out the competency framework for the HOOM, Administrator and RMT records management roles.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 12 comprises:</p> <ul style="list-style-type: none">• Information and Records Management Policy• Information and Records Management Handbook• Head of Operational Management Job Description (extract)
Future Developments	As part of the routine learning and development planning process, consideration will be given to seeking external training opportunities for records management staff.



Element 13: Review and Assessment

Introduction	<p>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.</p> <p>The Public Records (Scotland) Act 2011 says that an authority must keep its Records Management Plan under review.</p>
Statement of Compliance	<p>The SIC's records management systems are reviewed regularly, and the Records Management Plan will form part of future reviews.</p> <p>The SIC's Governance Reporting Arrangements provide for an annual report on Records Management to the Senior Management Team.</p> <p>The SIC has procedures in place to manage 'Key Documents' which ensure records management policies and procedures are reviewed regularly.</p> <p>SIC's current Operational Plan (2013/14) incorporates a range of Information Management related activities including an ARMS assessment.</p>
Evidence of Compliance	<p>Evidence submitted in support of Element 13 comprises:</p> <ul style="list-style-type: none">• Governance Reporting Arrangements• Management and Review of Key Documents• Operational Plan 2013/14 (extract)• Information & Data Management Review Report
Future Developments	<p>There are no planned future developments in respect of Element 13.</p>



Element 14: Shared Information

Introduction	<p>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.</p> <p>The Keeper will expect an authority's RMP to reflect its procedures for sharing information.</p>
Statement of Compliance	<p>We comply with the requirements of the Data Protection Act 1998.</p> <p>We do not currently undertake data sharing exercises with other organisations.</p> <p>We have a statutory duty to respond to requests for information made under the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004. We share information openly through our publication scheme.</p> <p>SIC is familiar with the Information Commissioner's Data Sharing Code of Practice and will introduce appropriate procedures should circumstances change.</p>
Evidence of Compliance	<ul style="list-style-type: none">• Data Protection Policy• Publication Scheme – Guide to Information
Future Developments	None



Appendix 1 – Evidence Schedule

Items highlighted in grey are contained in a separate document –
Scottish Information Commissioner Records Management Plan – Evidence Extracts

Element		Evidence – Source Document	Evidence - Details
1	Senior Management Responsibility	Records Management Plan	Covering Statement – page 3
		Information & Records Management Policy	Section 3 - Roles & Responsibilities
2	Records Manager Responsibility	Records Management Plan	Covering Statement – page 3
		Information & Records Management Policy	Section 3 - Roles & Responsibilities
		Information & Records Management Handbook	Section 8 – Competences Framework
3	Records Management Policy Statement	Information & Records Management Policy	Whole Policy
4	Business Classification	File Plan & Retention Schedule	Part 1 – File Plan
5	Retention Schedules	Information & Records Management Policy	Section 2 – Review, Retention & Disposal
		Information & Records Management Handbook	Section 7 - Review and Disposal of Records
		Records Review Procedures	Whole Procedure
		File Plan & Retention Schedule	Part 2 – Retention Schedule
6	Destruction Arrangements	Information & Records Management Handbook	Section 7 – Review and Disposal of Records
		Records Review Procedures	Whole Procedure



Element		Evidence – Source Document	Evidence - Details
		Information & Records Management Policy	Section 2 – Review, Retention & Disposal
		File Plan & Retention Schedule	Part 2 – Retention Schedule
		6.1 – Certificate of Destruction – paper records	Sample Certificate
7	Archiving and Transfer Arrangements	Memorandum of Understanding between the Keeper and SIC	Whole Memorandum of Understanding
8	Information Security	Information & Records Management Policy	Section 6 – Information Security
		Information & Records Management Handbook	Section 3 – Hardware Section 4 – Software etc. Section 7 – Review and
		8.1 - Employee Handbook (extract)	Disposal of Records Section 4.1 – Confidentiality and official information
		8.2 - Employee Handbook (extract)	Disposal of Records Section 12.5 – Policy on the use of the Internet, Email and Other Business Communications Systems
		8.3 - Risk Register (extract)	Risk relating to information security
		8.4 - Staff Manual (extract)	Clear desk policy
		8.5 - Investigations Procedures (extract)	Section 13 – Records Management
		8.6 - Certificate of Destruction – IT	Sample Certificate
9	Data Protection	Data Protection Policy	Whole Policy



Element		Evidence – Source Document	Evidence - Details
		9.1 - Employee Handbook (extract)	Section 12.3 – Data Protection Policy in relation to Employee Information
		9.2 - Enquiries Procedure (extract)	Section 5 – Subject Access Requests
10	Business Continuity and Vital Records	10.1 - Business Continuity Plan (extract)	Section 1 – Day 1 to 6 Action Plan Section 2 – Core Recovery Team Contents Page
11	Audit Trail	Information & Records Management Policy	Section 4 – Performance Review and Compliance Monitoring
		Information & Records Management Handbook	Section 6 – Records Storage, version Control, Naming Conventions & Indexing
		Records Review Procedures	Whole Procedure
		11.1 - INVU destruction log (extract)	Sample log
		11.2 - Paper destruction log (extract)	Sample log
12	Competency Framework for Records Management Staff	Information & Records Management Policy	Section 3- Roles and Responsibilities
		Information & Records Management Handbook	Section 9 - Competences Framework
		12.1 - Head of Operational Management Job Description (extract)	Records Management Responsibilities
13	Review and Assessment	Governance Reporting Arrangements	Whole Document
		Management and Review of Key Documents	Whole Procedure



Element		Evidence – Source Document	Evidence - Details
		13.1 - Operational Plan 2013/14 (extract)	Information Management Section
		Information & Data Management Review Report	Whole Report
14	Shared Information	Data Protection Policy	Whole Policy
		Publication Scheme – Guide to Information	Whole Guide



Appendix 2 - Document Control Sheet

Document Information	
Full name of current version: Class, Title, Version No, INVU version no and status. <i>E.g. C1MOU Between the SIC and the ICv01.25</i>	C5 Scottish Information Commissioner Records Management Plan v01.02
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Responsible Manager (<i>SIC, HOE, HOOM, HOPI</i>)	HOOM
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Summary of changes to document				
Date	Action by <i>(initials)</i>	Version updated <i>(e.g. v01.25-36)</i>	New version number <i>(e.g. v01.27, or 02.03)</i>	Brief description <i>(e.g. updated paras 1-8, updated HOPI to HOOM, reviewed whole section on PI test, whole document updated, corrected typos, reformatted to new branding)</i>
21/05/14	KB		01.01	Final Approved version created
21/05/14	KB	01.01	01.02	DCS update
27/05/14	DL	01.02	01.03	DCS update
13/03/14	KB	01.03	01.04	Update web link
14/07/14	KB	01.04	01.05	DCS updated, uploaded to Guide to Information
22/02/18	KB	01.05	01.06	DCS updated, published on website
09/09/20	KB	01.06	01.07	Updated review date to bring into line with NRS review date
09/09/20	KB	01.07	01.08	Opened in edit mode in error
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