Records Management Policy

Name of Record	Records Management Policy
Author	Senior Information and Improvement Officer
Owner	Chief Executive's Business Manager
Status	draft
Approved by	
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Version	Notes	Author	Date
0.1 – 1.2	[See previous versions for version history]	AJC	2014-2017
2.0	Substantial re-write with input from HJ. Included introduction further detailing importance of records management; "Purpose" section; ref. to ISO 15489; "Roles and Responsibilities" section; further "Principles"; sections on related standards and policies.	SIIO	23/10/20
2.1	Incorporated suggestions form HJ	SIIO	28/10/20
2.2	Further amendments from HJ	SIIO	23/11/20
2.3	Minor typos and amended references to the role of information asset owners	SIIO	10/02/21
2.4	Added reference to M365 IG Policy	SIIO	15/02/21
2.4.1	Minor typo in review para	SIIO	16/02/21
2.5	Incorporated amendments from Data Protection Officer. Removed ref. to "Data Quality Policy" and noted that "Info Gov Strategy" is in draft. Removed ref. to GDPR and amended ref. to DPA. Removed pre2.0 version control notes. Added hyperlinks to related policies.	SIIO	24/02/21

Introduction

Our records are a key council asset, and must be adequately created, captured and managed to meet the needs of the Council and our citizens for:

Operational use/value

- to serve the purpose for which they were originally created

- to support our decision-making processes

Organisational learning and business development

- to provide evidence and understanding of the delivery, scrutiny and improvement of front-line service delivery, helping us deliver our vision of being a Modern, Ambitious Council

- to allow us to look back at decisions made previously and learn from previous successes and failures

Internal and external accountability

- to protect and provide evidence of the rights and responsibilities of the Council and of our citizens

- to demonstrate transparency and accountability for all actions

- to provide evidence of legislative, regulatory and statutory compliance

- to demonstrate that all business is conducted in line with best practice.

Historic and cultural value

- to protect and make available the corporate memory of the Council and the East Renfrewshire to all stakeholders and for future generations.

Benefits of Records Management

Good records management ensures efficiency in the creation, storage and use of information. It allows the maximisation of corporate knowledge while maintaining appropriate security. It ensures that information can be retrieved and used when it is required, and that it is accurate, authentic and reliable. Proper management also means that records are retained only as long as they are required but that information of long-term archival value is kept as the permanent corporate memory of the Council.

Good quality records and information management will benefit the Council by:

- Delivering best value by encouraging efficiency in the accuracy, storage and retrieval of information
- Ensuring adherence to statutory obligations, including those established by the Public Records (Scotland) Act, the Data Protection Act 2018 and the Freedom of Information (Scotland) Act 2002
- Demonstrating evidence of accountability and information about the Council's decisions and activities
- Supporting the delivery of efficient and effective frontline services by providing appropriate access to full and accurate records
- Saving of physical and virtual space through the reduction of duplication and timely destruction of obsolete information.
- Ensuring the identification and survival of records for permanent preservation as part of the Council's corporate memory

Purpose

This policy and associated procedures and guidance, as set out in our Records Management Plan, are intended to ensure that Council records are managed efficiently, transparently and consistently throughout their life-cycle from the point they are created or received, through maintenance and use, to the time they are destroyed or permanently preserved as historic archival records.

This policy:
- provides the baseline requirements for good records management within East Renfrewshire Council to ensure records are created, managed and used effectively and efficiently and in compliance with statutory and regulatory obligations and internal policy;
- defines records management responsibilities throughout East Renfrewshire Council;
- underpins a working culture which acknowledges the value and benefits of accurate record creation and effective management;
- encourages a leaner Council that retains records for only as long as required for business purposes.

Scope

This policy applies to:

- all records[1] which are created, received, managed and used in the delivery of Council business, regardless of format or location
- All Council staff, including temporary staff, students and volunteers who access and use Council information and the information systems that store them.
- All third parties that manage and process information on the organisation's behalf when supporting delivery of Council statutory or business functions.

Roles and Responsibilities

The Chief Executive has ultimate responsibility for ensuring that adequate records are created and managed to meet the needs of the Council and its citizens and she is the senior officer responsible for the management of the Council's records plan under section 1(2a) of the Public Records (Scotland) Act, 2011.

The Senior Information and Improvement Officer has overall responsibility for developing and implementing the Records Management Plan.

Senior Managers in each service have overall responsibility to ensure that records within their service are managed according to statutory responsibilities and Council policies. They must do this by ensuring that;

- there are up to date, authorised, comprehensive and relevant record retention rules for their Service within the Council's Retention Schedule
- where required, local procedures are issued and reviewed within their service areas
- contracts with third parties performing a public function contain appropriate clauses on expected records management behaviour

It is the responsibility of all staff to ensure that they create and capture appropriate records of their work in the Council and manage all records and information they use to support their work in line with the following principles

- Information is a vital corporate resource.

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[1]As defined by ISO 15489, East Renfrewshire Council defines its records as "information created, received, and maintained as evidence and as an asset by the organization, in pursuit of legal obligations or in the transaction of business".

- Records belong to the Council – not to individual officers or departments.
- Every member of staff has responsibilities to manage the records that they deal with.
- Records should be held in a properly managed system.
- Records should be reliable, accurate, up-to-date and fit for purpose.
- Records should remain accessible for the lifetime of their retention.
- Personal, sensitive or confidential information should be appropriately managed.
- Records should be disposed of in accordance with the Council's Records Retention Schedule.
- Good records practice should be applied to information in ALL media – physical AND electronic.

East Renfrewshire Council is committed to managing its records in line with the following principles of good records management as defined by the National Records of Scotland[2].

- **Authentic** - it must be possible to prove that records are what they purport to be and who created them, by keeping a record of their management through time. Where information is later added to an existing document within a record, the added information must be signed and dated. With electronic records, changes and additions must be identifiable through audit trails.
- **Accurate** - records must accurately reflect the transactions that they document.
- **Accessible** - records must be readily available when needed.
- **Complete** - records must be sufficient in content, context and structure to reconstruct the relevant activities and transactions that they document.
- **Comprehensive** - records must document the complete range of an organisation's business.
- **Compliant** - records must comply with any record keeping requirements resulting from legislation, audit rules and other relevant regulations.
- **Effective** - records must be maintained for specific purposes and the information contained in them must meet those purposes. Records will be

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[2] https://www.nrscotland.gov.uk/record-keeping/records-management#principles

identified and linked to the business process to which they are related.

- **Secure** - records must be securely maintained to prevent unauthorised access, alteration, damage or removal. They must be stored in a secure environment, the degree of security reflecting the sensitivity and importance of the contents. Where records are migrated across changes in technology, the evidence preserved must remain authentic and accurate.

Records Management Framework

East Renfrewshire Council will deliver this commitment in practice by establishing and maintaining the following record keeping standards, tools and controls, proportionate to the records risk and value of their related business activity or transaction.

- A business classification scheme to reflect the functions, activities and transactions of the Council

- An information retention and disposal schedule providing authoritative rules on how long we need to retain each series of records.

- Destruction arrangements detailing the correct procedures to follow when disposing of business information.

- An information asset register documenting the management requirements of all our information and records assets, based on their value and risk to the organisation.

- Metadata schema, data quality standards and controlled vocabularies to aid information search and retrieval and an understanding of business context.

- Incorporation of records and other information assets vital to the continuity of East Renfrewshire Council operations and service delivery in business continuity policy and plans.

- Digital preservation arrangements in place for records required for long term or permanent retention to maintain their authenticity, accessibility, integrity and usability over time

- Adequate processes and controls in place to meet the records management requirements of existing physical and IT systems.

- Clearly documented records management requirements specified and delivered as part of any major change to IT systems and business processes.

- Information security controls in place to protect records and systems from

unauthorised access, use, disclosure, disruption, modification, or destruction.

- Processes and procedures in place to ensure preservation of, and access to, our historic archives.

- The provision of adequate training as part of the corporate induction process for all new starts, and refresher training for existing staff, to ensure they are equipped to fulfil the records management responsibilities of their job role.

- A performance, risk and compliance framework in place to monitor policy compliance, assess benefits realisation and prioritise ongoing improvement action.

Relevant Legislation and Regulations/External Operating Environment

Compliance with this policy will help the Council meet the requirements and obligations of our external operating environment including:

- Compliance statutory and regulatory obligations of all organisational functions, for example Health, Safety and Environmental legislation and Financial and Procurement regulations

- Maintaining accreditation with industry standards such as ISO Quality Standards, training accreditation awarding bodies such as the SQA, and professional bodies such as Investors in People.

- Contractual requirements with our public and private customers.

- Effective, efficient and secure information sharing and Partnership working.

- Compliance with our information governance-related statutory obligations including
  - Data Protection Act 2018
  - Human Rights Act 1998
  - Environmental Information Regulations Scotland
  - Freedom of Information (Scotland) Act 2002
  - Public Records (Scotland) Act 2011
  - Privacy and Electronic Communications Regulations 2003
  - Surveillance Camera Code of Practice
  - Payment Card Industry (PCI) Data Security Standard 3.1
  - Equality Act 2010
  - Re-Use and Open Data

Related Council Policies

The Records Management Policy links to the following Information Governance policies:

- o Information Governance Strategy (in development)
- o Data Protection Policy
- o Freedom of Information Policy
- o Information Security Policy
- o Business Continuity Policy
- o Employee Code of Conduct
- o IT Acceptable Use Policy
- o M365 Information Governance Policy (in development)

Performance Review and Compliance Monitoring

Policy compliance and performance improvement will be monitored against agreed criteria and performance targets and reported to senior management on a regular basis. The Policy will be reviewed within two years or as required by legislative or operational changes.

Should you have any queries or require further clarification regarding any aspects of this policy please contact the Senior Information and Improvement Officer.