Agenda Item	**20.a**
Report No	**FHR/ 133/13**

The Highland Council

**Finance, Housing and Resources Committee
9 October 2013**

Records Management Policy

Report by Assistant Chief Executive

Summary

This report informs Members on the annual review of the Records Management Policy and seeks approval of this updated Policy.

1 Background

1.1 There is a commitment to carry out regular reviews of information management policies and the Records Management Policy is due a review as it was last reviewed in 2009. It applies to all staff, Members and any person who handles Council Information Assets.

1.2 Following an agreed inspection by the Information Commissioner Office (ICO) into the Council's compliance with the Data Protection, the Council made a number of commitments. This included a commitment to carry out any outstanding Information Management Policy reviews by the end of October to create a complete and current Information Management Policy Framework.

1.3 The Information Management Strategy has been reviewed and an Information Security Policy produced, both of which were approved at the August FHR Committee. The review of the Records Management Policy is the next step in meeting this commitment and together with other Information Management Policies being brought to this committee complete this Policy Framework.

1.4 A further driver for the review of the Records Management Policy is the need to meet requirements under the Public Records (Scotland) Act 2011. This requires the council to prepare and implement a Records Management Plan (RMP) which sets out proper arrangements for the management of Council records. This requirement only comes into effect when the council is contacted by the keeper of Records of Scotland and given a date to submit this RMP.

1.5 The Highland Council has not yet been invited to submit our RMP and once we receive this request there may be a need to make further amendments to the Records Management Policy to support the agreed Plan.

2 Key Objectives of the Policy

2.1 The key objectives of this policy are to:

2.2 Achieve a common and consistent approach to records management throughout all Services. This Policy and the Information Management Strategy and Policy Framework provide the support for this to be fully implemented and enforced.

2.3 Create a clear policy position on the records management principles and individual responsibilities within the Council. This can then be communicated to staff and those who handle Council information.

2.4 Mandate corporate standards for records keeping; and set out a defined and clear governance structure for monitoring and reporting on records management. This will also be supported by a Service Level Agreement which is currently being developed between the Council and Highlife Highland in relation to the operation of the Records Management Service. The lead within the Council for records management is the Senior Information & Security Officer (on behalf of the Head of eGovernment), with the HLH Records Manager delivering Records Management services on behalf of the Council.

2.5 To Support compliance with legislation relating to records management e.g., The Data Protection Act 1998, Freedom of Information (Scotland) Act 2002, Environmental Information (Scotland) Regulations 2004. This is achieved through both the clear Council commitment set out in Policies and the support they provide for implementation of changes across the Council.

3 Policy Review and Changes

3.1 The Policy statement has been expanded to provide more detail on the council commitment to effective records management and provide policy support for the work that is currently under way to improve Information and records management within the council; in particular through the IM Governance Board and the Corporate Improvement Programme Managing Information Project.

3.2 The introduction of the Public Records (Scotland) Act 2011 requires changes to the policy to make reference to and to set out more detail on the work the council is already undertaking to manage our records. As stated in the background of this report there may be a requirement for further changes once a full evaluation of requirements has been undertaken and the Council is required to submit an RMP.

3.3 New and expanded information on the records management responsibilities have been added that reflect the maturing Information Management Strategy and governance structures within the Council. This is needed to set out more clearly in policy the obligations that all those handling Council information have. This is further backed up by the obligations set out in the other Information Management Policies.

3.4 A new section on Governance has been added and includes details on the newly formed Information Management Governance Board. This provides a strategic oversight of the Information Management Strategy delivery and provides an important channel for communicating records management requirements through services via the IM Lead Officer role.

3.5 The commitment for a single Council Corporate Retention Schedule that all services must follow is also now clearly stated in the Policy. This is essential to demonstrate effective records management and compliance with legal obligations around the management of information. Further work is required to review the process and work programme for the development of the council's Corporate Retention Schedules and this will be led by the Records Manager and Senior Information & Security Officer.

3.6 The commitment to develop a complete Corporate Information Asset Register is set out. The council has already made this commitment to the ICO and it is necessary to support delivery of the Information Management Strategy. The key role that Information Asset Owners play in this is set out and will be supported with further corporate guidance and the additional support that is now being made available through the Corporate Improvement Programme Managing Information Project.

4 Policy Implementation

4.1 The Highland Council's Information Management Strategy sets out the overall Information Management strategy for the Council and Records Management is an important component of that. The Information Management Strategy Implementation Plan sets out how the Records Management Policy requirements will be delivered through a Records Management Strategic Initiative. This is led by the Senior Information & Security Officer and the Records Manager.

4.2 The Policy will be made available to staff through the Intranet and for others who are within scope of the Policy through the Highland Council website.

4.3 Staff and any person handling Council Information are provided with an online learning module that provides an introduction to the expectations the Council places on those handling information. This includes the records management as well as information security and data protection issues that staff should be aware of. This must be completed by all those who handle Council information.

5 Implications

5.1 **Legal & Risk:** Through the review of the Records Management Policy we are meeting commitments to the Information Commissioners Office. And through maintaining a current policy position this supports compliance with the Public Records (Scotland) Act 2011, Data Protection Act 1998, Freedom of Information (Scotland) Act 2002 and Environmental Information (Scotland) Regulations 2004.

5.2 **Resource:** Communication and Implementation will be carried out using existing resources identified through the Records Management Service, Information Management & Security Team and the Corporate Improvement Programme Managing Information Project. Due to the scale of the work required further resources may be required and if so this will be identified through the Managing Information Project.

5.3 **Finance:** There are no implications arising from the review of this policy.

5.4 **Equalities:** The review of this policy does not have a detrimental effect on any particular group.

5.5 **Climate Change & Carbon Clever:** There are no implications arising from the review of this policy.

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6. Recommendation

6.1 Members are asked to:
   i.   Note the changes and approve the revised Records Management Policy

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Date: 16 September 2013
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Background Papers: Records Management Policy