

HIGHLAND AND WESTERN ISLES VALUATION JOINT BOARD

Records Management Plan

Setting out proper arrangements for the management of records under the Public Records (Scotland) Act 2011

December 2015

Version 1.0

Version Control

Version	Originator	Summary of Changes	Date
1.0	Frank Finlayson	New document	24 Dec 2015

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1. Introduction

The Public Records (Scotland) Act 2011 ('the Act') came fully into force in January 2013. The Act requires Highland and Western Isles Valuation Joint Board (HWIVJB) and other public authorities to prepare and implement a Records Management Plan (RMP). The RMP sets out proper arrangements for the management of records within the Board. The plan is agreed with the Keeper of the Records of Scotland ('the Keeper') and reviewed by HWIVJB on an annual basis.

A copy of the Act can be viewed online at:
www.legislation.gov.uk/asp/2011/12/part/1/enacted

More information about the Public Records (Scotland) Act 2011 can be found by visiting the National Records of Scotland website at:
www.nas.gov.uk/recordKeeping/publicRecordsActIntroduction.asp

In line with the Act, all records created in the carrying out of the Board's functions (whether directly or by third parties) are public records. Part 1, section 3.1 of the Act states that:

"public records", in relation to an authority, means—

- (a) records created by or on behalf of the authority in carrying out its functions,*
- (b) records created by or on behalf of a contractor in carrying out the authority's functions,*
- (c) records created by any other person that have come into the possession of the authority or a contractor in carrying out the authority's functions."*

Establishing effective records management arrangements helps to deliver a number of business benefits. For example:

- efficient and systematic control of the creation, storage, retrieval, maintenance, use and disposal of records
- faster, more accurate and reliable access to records
- compliance with legislative and regulatory requirements

2. Records Management Plan

HWIVJB's RMP relates to records throughout their lifecycle, from creation and acquisition to archive and destruction. It encompasses all records across all our service areas.

HWIVJB's RMP sets out the overarching framework based on the 14 elements of the Keeper's published Model RMP.

The 14 Elements are:

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

HWIVJB has provided the Keeper with evidence of policies, procedures, guidance and operational activity on all elements of the RMP.

The RMP is effective from 24 December 2015 and will be reviewed and updated on an annual basis.

3. Elements of the Plan

Element 1: Senior Management Responsibility

Identify a person at senior level who has overall strategic responsibility for records management

Senior management responsibility for records management within HWIVJB covered by the RMP lies with:

Assessor & Electoral Registration Officer	William J Gillies Assessor and ERO Moray House 16/18 Bank Street Inverness IV1 1QY
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Evidence:

Document No:

Records Management Policy

1

Future Development

There is no planned development but review will be required if there is a change to the Senior Responsible Officer.

Element 2: Operational Records Management Responsibility

Identify an individual within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation.

The individual answerable to senior management and who has operational responsibility for records management within HWIVJB covered by the RMP is:

Assistant Assessor (Inverness)	Frank Finlayson Assistant Assessor Moray House 16/18 Bank Street Inverness IV1 1QY
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Evidence:

Document No:

Records Management Policy

1

Job Specification (Assistant Assessor)

2

Future Development

There is no planned development but review will be required if there is a change to the Officer responsible for operational management of records.

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 Records Management Policy has been revised to take into account the requirements of Public Records (Scotland) Act 2011. It is available on the Board's website http://www.hIGHLAND.gov.uk/downloads/file/15623/records_management_policy

HWIVJB's commitment to establishing and maintaining effective records management is set out in the Records Management Policy and includes the signed statement below from the Assessor and Electoral Registration Officer.

"It is the aim of the Highland and Western Isles Valuation Joint Board to achieve efficiency benefits through best practice applied to records management. This is intended to lead to improvements in the use of personnel and financial resources.

Best Practice in records management will ensure that all information:

- *Received or created is stored in the appropriate way and is easily retrievable*
- *Is retained, destroyed or preserved in accordance with the Board's Retention and Disposal Arrangements*
- *Meets our current needs and our requirements into the foreseeable future*
- *Is capable of enabling change when required*
- *Is easily accessible to users and that the skills and technology are available to achieve this aim*

The Public Records (Scotland) Act 2011 emphasises the importance placed on records management in local authorities. It is our aim to draft and implement an effective Records Management Plan in order to meet the requirements of the Act. The Plan will be reviewed at regular intervals to ensure its effectiveness."

HWIVJB also recognises the legal obligations to set out proper records management arrangements to ensure compliance with other legislation such as the Freedom of Information (Scotland) Act 2002, Data Protection Act 1998 and Local Government (Scotland) Act 1994.

The records of HWIVJB constitute an auditable account of the authority's activities, which provides evidence of the business, actions, decisions and resulting policies formed by the Board.

Records represent a vital asset, which support the daily functions of the Board and protect the interests and rights of staff, and members of the public, who have dealings with us.

HWIVJB uses three main types of records management systems:

- Manual Filing Systems (where it is necessary to keep paper and other physical records)
- IT applications and databases that process records for specific functions (i.e. Valuation for the purposes of Non-Domestic Rating and Council Tax and associated systems and Electoral Registration)
- Storage of electronic documents on shared drives

All records management systems are subject to the records management policy, procedures, guidelines and elements of the RMP.

Evidence:

Document No:

Records Management Policy

1

Highland Council Information Security Policy

3

Future Development

There is no planned development. However the policy is subject to annual review to ensure its suitability.

Element 4: Business Classification

A business classification scheme describes what business activities the authority undertakes– whether alone or in partnership.

HWIVJB has maintained a Records and Disposal Arrangements schedule in accordance with the Freedom of Information (Scotland) Act 2002. This details the function; activities and transactions and forms the basis of our Business Classification Scheme

The classification scheme is a functional model which groups related business activities and transactions which are part of the overall functions of the Board.

The business classification scheme is structured in three tiers:

Level 1: functions

Level 2: activities

Level 3: transactions

The functions, activities and transactions are detailed in the Records Retention and Disposal Arrangements Schedule.

Evidence:

Document No:

Retention Guidelines & Disposal Arrangements

4

Records Retention and Disposal Arrangements Schedule

5

Future Development

To be formally reviewed annually.

Element 5: Retention Schedules

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

The Records Management Policy outlines the need to detail the retention periods and subsequent disposition actions for all types of record through a retention schedule. The Records Retention and Disposal Arrangements Schedule is as an essential part of our overall Records Management Plan, ensuring that records are kept for no longer than is absolutely necessary and disposed of as appropriate.

A Records Retention and Disposal Arrangements Schedule was developed in accordance with the Freedom of Information (Scotland) Act 2002 and forms a pre-existing structure for managing records within HWIVJB.

The purpose of a Records Retention and Disposal Arrangements Schedule is to provide consistent instructions on records retention and disposal for all staff who deal with records. The Schedule will underpin our Records Management programme.

The Records Retention and Disposal Arrangements Schedule will help to establish the types of records we need to keep, how long records are required and what should be done with them at the end of that period.

The Retention Schedule and Disposal Arrangements Schedule is intended to cover all records, regardless of medium or format, which are created or received during the course of business.

The Schedule needs to be reviewed to ensure that the retention and disposal arrangements in respect of electronic records are clearly stated.

Evidence:	Document No:
Retention Guidelines & Disposal Arrangements	4
Records Retention and Disposal Arrangements Schedule	5

Future Development

Rules need to be clarified for the structure of our electronic files within the shared drive and their subsequent destruction, retention or transfer to the archivist. This work is due for completion within financially year 2016/17.

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.

Guidance has been produced on destruction arrangements for HWIVJB records which have reached the end of their retention period and have been identified as suitable for destruction in accordance with the Records Retention and Disposal Arrangements Schedule.

The destruction arrangements have been developed in line with HWIVJB's Records Management Policy. Unless there are any special instructions or unique circumstances, records generally will be destroyed at the end of their retention period. Retaining any record past the mandatory retention period should be on an exception-only basis, weighing a record's potential usefulness against cost/space limitations.

In respect of confidential paper waste small batches are destroyed locally using appropriate shredders. For bulk waste Northern Recycling Solutions Ltd provide our offices with sacks which are removed from site and shredded. A certificate of destruction is then issued.

All paper and digital media and IT equipment is disposed of in accordance with the Highland Council Information Security Policy.

Evidence:	Document No:
Highland Council Information Security Policy	3
Records Retention and Disposal Arrangements Schedule	5
Contract Information Notice - Confidential Waste Disposal Services	6
HC Waste Disposal Agreement Contract Info Notice - NR Tender Docs	7
Highland Council - Tender Response	8
Northern Recycling Destruction Certificate	9

Future Development

We are presently in discussion with Corona Service as to a creating a simplified method for destroying records held electronically at the end of their retention period within our council tax and valuation roll system.

Element 7: Archiving and Transfer Arrangements

This is 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.

Guidance will be produced on Records Archiving and Transfer Arrangements.

The guidance will outline the process for transferring all records which have reached the end of their specified retention period, and need to be archived in accordance with advice in the Records Retention and Disposal Arrangements Schedule, to archives for long term preservation.

It is intended the archiving arrangements are developed in line with the Records Management Policy and one of the policy's key objectives to make preservation arrangements for records of long-term worth. The Records Management Policy further outlines a commitment, which the process outlined in this document fulfils, to documenting the arrangements for destruction or archiving of records in accordance with the agreed retention schedule.

Arrangements are being made with the Archivist to identify and enable transfer of those records which require formal archiving. A Records Archiving and Transfer Arrangements Policy will be formulated from these discussions.

Evidence:	Document No:
Records Retention and Disposal Arrangements Schedule	5
Information Security Policy and Standards	3

Future Development

Guidance for archive and transfer arrangements to be put in place following meeting with Senior Archivist on 18 January 2016.

Element 8: Information Security

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

HWIVJB follows the Highland Council Information Security Policy which summarises the security framework in place for records which fulfils the security commitments outlined in the Records Management Policy.

Securing information assets, and in particular records, will help to fulfil legislative responsibilities, safeguard HWVJB's reputation, ensure business continuity, optimise the management of risk and minimise the impact of security incidents.

As a key information asset, the security of all records will be managed in accordance with the HWIVJB's existing approved Information Security Policy and Standards.

Every individual with access to records is responsible for ensuring their protection.

All staff receive information security awareness training and are reminded of the importance of security at intervals. Additionally all staff have been vetted to a basic level by Disclosure Scotland.

Procedures and processes are in place to deal with threats, risks and breaches of security.

Evidence:

Document No:

Highland Council Information Security Policy

3

Future Development

There is no planned development but the evidence will be regularly reviewed to ensure continuing suitability.

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.

HWIVJB relies on the information that it collects and holds to fulfil its aims, objectives, and obligations with reference to “carry out our property valuation and management functions, to maintain our accounts and records and to support and manage our employees”. Information relating directly to individuals (personal data) is an essential asset which must be properly managed in order to deliver efficient and effective services, ensure legal compliance, and to protect the Board’s reputation and image as a responsible organisation.

The Data Protection Act 1998 places obligations on organisations that use personal information and gives individuals certain rights. The Act states that those who record and use personal information must be open about how the information is used.

As a Data Controller, HWIVJB is registered as such with the Information Commissioner’s Office (ICO). The Board’s Registration can be viewed on the ICO website, www.ico.gov.uk . The Registration number is: **Z7182146**

Evidence:	Document No:
Data Protection Registration Documents	10
Highland Council Information Security Policy	3

Future Development

There is no planned development but the evidence will be regularly reviewed to ensure continuing suitability.

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.

A Business Continuity Plan (BCP) is in place in the event of any disaster. The senior management team shall identify vital records in the Retention and Disposal Arrangements schedule which are essential to the continuation of the service should there be a disaster. Thereafter suitable arrangements will be put in place to ensure access to such records in an emergency.

Evidence:

Document No:

Business Continuity Plan

11

Records Retention and Disposal Arrangements Schedule

5

Future Development

There is no planned development but the evidence will be regularly reviewed to ensure continuing suitability.

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.

It is recognised that, at present, the Board does not have comprehensive procedures in place in relation to audit trails covering all transactions undertaken.

At present, electronic systems within the authority are able to provide audit trails for electronic records within our electoral registration software provided by Strand IDOX and in our valuation roll and council tax software as provided by Corona Service.

Audit trails for paper records are more rudimentary and are at present subject to development work as we look to integrate the audit of paper files within the software provided by Corona Service.

Currently we are logging the removal of paper files using a folder of sheets to record the logging in and out of files as they are removed and returned with a view to an interim Access database being used until the software is fully developed by Corona Services.

Evidence:	Document No:
File logging sheet	12
Strand IDOX Audit documentation	13
Corona Service A2K audit screenshots	14

Future Development

Development of software to monitor the movement of paper files in conjunction with Corona Service.

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 Records Management Policy includes objectives to improve staff understanding and knowledge of records management with information and make appropriate training available.

All staff within HWIVJB must complete mandatory online training in Information Security Awareness and Data Protection.

Currently there is no approved framework in place which details competencies required by staff with responsibility for the records management function to effectively support business, meet corporate goals, implement best practice, ensure the organisation is accountable and comply with legislation, particularly requirements of the Public Records (Scotland) Act 2011.

The Assistant Assessor responsible for Records Management will have access to training that he and senior management agree is necessary in carrying out their function of records management.

Evidence:

Document No:

Records Management Policy

1

Future Development

Further training opportunities as and when they arise.

Element 13: Assessment and Review

Regular 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.

The Records Management Plan and Records Management Policy will be subject to the Board's governance, monitoring and review process. The RMP will be formally reviewed on an annual basis.

Governance over the RMP is set out in the table below.

Group/Individual	Governance/Scrutiny Role
Assistant Assessor (Records Manager)	Developing and implementing policies and procedures relating to the plan and monitoring/reporting progress. Reviewing and implementing policies, procedures and standards. Monitoring projects relating to this plan. Scrutinise and review the plan and supporting strategies, policies and progress.
Senior Management Team	Approval of the plan and associated strategies and policies

Evidence:

Document No:

Records Management Policy

1

Future Development

There is no planned development.

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.

In limited circumstances HWIVJB information is shared with a third party. Alternatively HWIVJB will receive confidential information from partner organisations. In each case appropriate agreements are entered into to ensure confidentiality of the information

Evidence:

Document No:

Highland Council Information Security Policy

3

Minute of Agreement between Combining Assessors

15

DSA 14 – 17 year olds

16

Future Development

To identify areas where data is shared and to ensure that appropriate data sharing agreements are put in place.

4. Contractors

It should be noted that prospective tenderers should be aware that, as a Scottish Public Authority, the Council is bound by the provisions of the Public Contracts (Scotland) Regulations 2012.

In terms of the Public Records (Scotland) Act 2011 all public records managed by the Authority must be managed in accordance with the Records Management Plan (RMP), which has been approved by the Keeper of the Records of Scotland.

The RMP, and the guidance issued by the Keeper, indicate that certain records created by the successful tenderer(s) appointed under this tendering exercise are themselves likely to be considered as “public records” under section 3(1) of the Public Records (Scotland) Act 2011. The Council is accordingly obliged to take steps to ensure that these records will be managed properly during their operational lifetime, and that appropriate steps will be taken to ensure they are retained for a suitable period after they cease being operational (which may include identifying records for transfer to permanent archive).

5. List of supporting evidence

Specific to the 14 Elements of the Plan

Document No:

Records Management Policy	1
Job Specification (Assistant Assessor)	2
Highland Council Information Security Policy	3
Retention Guidelines & Disposal Arrangements	4
Records Retention and Disposal Arrangements Schedule	5
Contract Information Notice - Confidential Waste Disposal Services	6
HC Waste Disposal Agreement Contract Info Notice - NR Tender Docs	7
Highland Council - Tender Response	8
Northern Recycling Destruction Certificate	9
Data Protection Registration Documents	10
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