Records Management Policy

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Document Control Information

Revision	Date	Revision Description
1.0	01/01/2014	Final approved
1.1	09/04/2014	Revised definition of 'Record'
2.0	23/02/2018	Reviewed, minor formatting changes. Section 3.0 – reference to GDPR added. Owning section and master file location changed. The policy should be revisited following review of the Council structure in 2018.
2.1	25/07/2018	Updated to reference the Data Protection Act 2018.
2.2	29/05/2022	Minor changes
3.0	14/04/2025	Reviewed. Minor formatting changes. Records Officer changed to RADM Team Lead. Third-party processing included in Scope.

Contents

Introduction

Midlothian Council (the Council) creates, uses and receives records which are a valuable resource and an important asset, supporting its legal, fiscal, business and administrative requirements. The systematic management of the Council's records, from creation to disposal, is essential to protect and preserve them as evidence of actions, to support present and future activities and business decisions, and to ensure accountability to present and future stakeholders. Furthermore, effective records management is central to upholding the Council's obligations under information legislation, including the Data Protection Act 2018, the Freedom of Information (Scotland) Act 2002, and the Public Records (Scotland) Act 2011.

Overview

The Records Management Policy sets out Midlothian Council's commitment to consistently and securely create, keep and dispose of high-quality records documenting its business and activities. The policy also defines the characteristics of high-quality records, and describes the mechanisms of planning, governance and training that support compliance with the policy.

Legislative framework

The Records Management Policy has been created with reference to the following legislation and standards:

Legislation
- Data Protection Act 2018
- General Data Protection Regulation
- Freedom of Information (Scotland) Act 2002
- Public Records (Scotland) Act 2011

Standards
- ISO 15489: Information and Documentation – Records Management
- Section 61 Code of Practice on Records Management

Intended audience

All council employees and workers, such as, contractors, consultants, volunteers and agency staff that have authorised access to council information/systems or process council information, are responsible for ensuring that records in their care are properly managed. They are required to:

- Read and acknowledge their understanding of the Records Management Policy
- Complete an e-learning module in information management, including records management

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Scope

The Records Management Policy applies to:
- All information, records and data held, maintained and used by, or on behalf of, the council in all locations/systems and in all formats (digital and physical).
- All information, records and data processed by third parties and contractors when performing a statutory Council function or service in partnership or under contract or agreement.

Definitions

Classification: the categorisation of records (both digital and paper) into hierarchical classes of activities and functions.

Document: any account or collection of data and/or information. Not all documents should be treated as records or require to be subjected to formal records management procedures. For example, copies of records, meeting requests, desk booking notifications. However, all documents must be handled securely in line with information security and data protection policies and procedures, even if they are not official records. See 'Record' below.

Disposal: the final action on a record, normally either destruction or transfer for permanent preservation.

Metadata: data about data. For example, this might include the date a record was created and the name of the person who created it.

Record: 'information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business.'[1] All records start off as documents, but not all documents will ultimately become records. Certain records management procedures, such as registration and official retention periods, only apply to original records, not copies. For example, signed minutes, approved policies, building plans. Copies can be treated as documents, see 'document' above, and official retention periods do not apply.

Retention schedule: a record which sets out how long particular types of records should be kept, and what disposal action should be taken.

Vital record: any record without which a service could not continue to function.

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[1] ISO 15489: Information and Documentation – Records Management

Policy statement

Effective management of current and historic records supports the business of the Council. In practice this means that:

- Accurate and robust record-keeping allows the Council to reliably identify people in need and provide them with the services they require quickly and efficiently, ensuring resources are directed where they are needed most.

- Good records management supports cost-effective and efficient business operations, freeing up valuable staff time to focus on the best possible frontline service delivery.

- By keeping records accurate and up to date, we ensure that reports on outcome indicators draw on authoritative information, thus supporting the Council to successfully achieve their targets.

- Sound recordkeeping practice supports partnership working with both service users and other public service providers, enabling productive working relationships while still protecting the Council against risks of information loss and/or unauthorised access to Council information.

- Preservation and promotion of accessible historical records encourage local people to engage with the history of their communities and generates learning opportunities for both young learners and adults. Public archive services also enhance the positive image of the Council, promoting cohesion in local communities and encouraging visitor spend in the local areas.

- Identification of business-critical records and effective disaster management, and preparedness regarding records and information, are essential to ensuring the long-term sustainability of Council business.

Principles of good records management

Midlothian Council accepts the following core principles as essential to maintaining effective records management across the organisation. These principles apply to the management of all records, whether paper or digital.

- Records management is recognised as a core corporate function.

- Records management policies and procedures are applied consistently across the organisation.

- Records management is included in a governance framework with clearly defined roles and lines of responsibility.

- Records are mapped to business functions and activities.

- Records are created according to agreed forms and structures.

- Records are created with associated metadata, which is persistently linked and managed.

- Records are kept in systems that enable them to be stored, retrieved, used and shared as necessary.

- Sufficient planning and resources are devoted to preserving records and making them accessible over time, particularly in the case of business-critical records.

- Records are maintained in a safe and secure environment, where access to them is controlled.

- Records are retained only for as long as they are required, and the Council can explain why records are no longer held.

- Records are destroyed in line with the confidential waste policy.[2]

- Record-keeping practice complies with legal and regulatory requirements, applicable standards and organisational policies, and compliance is regularly monitored and assessed.

- Proper arrangements are made for the long-term preservation of and access to materials of historic significance.

Characteristics of good records

Records contain evidence of the Council's business transactions and/or information relating to those transactions. Records can also contain information the Council requires as part of its legal obligations. It does not matter what format the record is in; a record can be an email, a file, a database, or any other format. What matters is the information the record holds, and whether it relates to Council business or legal obligations.

To support business effectively, it is important to keep high-quality records. To be considered 'good', a record should have the following characteristics:

Authenticity: the record is what it claims to be and has not been tampered with. It can be relied on as evidence, for example in court.

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[2] Confidential Waste Policy.pdf

Reliability: the contents of the record can be trusted as a full and accurate representation of the Council's transactions and activities.

Integrity: the record is protected against unauthorised alteration. Any authorised changes are clearly indicated and traceable.

Useable: the record can be located, retrieved, presented and interpreted. Links between related records should be clear. It should be easy to determine what activity or department created the record.

Records Management Plan

The Council's Records Management Plan (RMP) sets out the framework of policies, procedures, and tools used to realise the principles of good records management. The RMP is included in the Council's Information Management Strategy as part of the roadmap for developing a culture of excellence in information management.

The RMP has been developed in line with the Council's obligations under the Public Records (Scotland) Act 2011.[3]

Strategic Information Governance Group

The Strategic Information Governance Group (SIGG) is responsible for identifying and maintaining high quality information assets in accordance with legislation and best practice, including the oversight and promotion of good records management in line with the principles outlined above. The SIGG is comprised of staff at divisional and strategic levels, with oversight by the Senior Information Risk Officer (SIRO) and Strategic Officer responsible for records management.

The Records and Archives Team Leader sits on the SIGG at the strategic level.

Training

The SIGG provides regular training in good records and information management practice. Training is delivered through several methods, including face-to-face training, e-learning, static guides, and awareness campaigns.

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[3] Records Management Plan | Records management | Midlothian Council

Positions responsible for compliance

- Strategic Officer: the Chief Officer Corporate Solutions and SIRO is the Strategic Officer responsible for records management. The responsibilities of this position include:

  - Overseeing the Council's compliance with the Public Records (Scotland) Act 2011
  - Overseeing implementation of the RMP and monitoring compliance
  - Acting as an advocate for records management to the Council's Central Management Team (CMT).

- Operational Officer: the Records and Archives Team Leader is the Operational Officer responsible for records management. The responsibilities of this position include:

  - Managing and developing the Council's modern records and historical archive service
  - Reviewing and implementing operational policies and procedures in line with the RMP
  - Supporting divisional staff in maintaining good records management practice
  - Participating in the Strategic Information Governance Group (SIGG) to support good information management across the Council
  - Presenting and disseminating information throughout the Council as necessary
  - Performing records surveys as necessary
  - Co-ordinating and overseeing retention scheduling practices throughout the Council
  - Co-ordinating and developing the corporate business classification scheme and file plan
  - Developing and delivering records management training to staff.

- Section Managers: each section manager is responsible for overseeing good record-keeping practice amongst staff and ensuring that staff are made aware of the RMP, records management procedures, and published guidance.

- Strategic Information Governance Group (SIGG) representatives: SIGG representatives serve as the main point of contact for departmental staff on issues to do with information and records management.

- Records Champions: responsible for representing local records management, including supervising and co-ordinating RM procedures, keeping central file registers, ensuring appropriate recording/authorisation of destructions, and liaising with RADM Team Lead.

- <u>All Staff</u>: all staff are responsible for using good record-keeping practice daily. Where staff are unsure of what good practice is or how to comply with the Records Management Policy, they should seek out guidance from SIGG representatives, Records Champions, or the Records and Archives Team Lead.

Review

This policy will be formally reviewed every two years or more frequently if needed in response to a specific issue or requirement to ensure it continues to be relevant and current.

Related Documents

1. Records Management intranet page with relevant documents and policies - Records Management
2. Midlothian Council Records Management Plan - Records Management Plan | Records management | Midlothian Council
3. Confidential Waste Policy - Confidential Waste Policy.pdf
4. Handling Sensitive Information Procedure - Handling Sensitive Information Procedure.pdf