

MIDLOTHIAN COUNCIL
RECORDS MANAGEMENT PLAN

Submitted in accordance with the Public Records (Scotland) Act 2011

This plan is fully endorsed by the Chief Executive and the Corporate Management Team, who will ensure compliance with the Public Records (Scotland) Act 2011 through the corporate implementation of this Records Management Plan.

Signed by:

Gary Fairley, Senior Accountable Officer for Records Management

Kenneth Lawrie, Chief Executive

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1.0 Introduction and Overview

1.1 *Records Management Plan*

This Records Management Plan (RMP) conforms to the model Records Management Plan as set out by the Keeper of the Records of Scotland, in accordance with the provisions of the Public Records (Scotland) Act 2011. This RMP covers both Midlothian Council and Midlothian Council Licensing Board, referred to jointly as ‘the Council’ throughout. The RMP outlines and evidences the Council’s policies and procedures regarding the creation, use, management and disposal of the public records it creates and uses in pursuance of its statutory functions.

In line with the model plan, the Council’s RMP addresses 14 elements:

[Element 1: Senior management responsibility](#)

[Element 2: Records manager responsibility](#)

[Element 3: Records management policy statement](#)

[Element 4: Business classification](#)

[Element 5: Retention schedule](#)

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[Element 11: Audit trail](#)

[Element 12: Competency framework for records management staff](#)

[Element 13: Assessment and review](#)

[Element 14: Shared Information](#)

1.2 *Records Management at Midlothian Council*

The Council operates an in-house records management service, including an off-site Records Centre and associated overflow stores. The Records Centre acts as a central secure store for all semi-current paper records generated across the Council, and it provides a daily file retrieval and return service. In addition, the Records Centre provides off-site storage for the Council’s archive collections, which are made available to the public via the Local Studies Search Room at:

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Local Studies
Library Headquarters
2 Clerk Street
Loanhead
EH20 9DR

Responsibility for the archives service is shared between the Records Officer and the Local Studies Officer, who is located within the Libraries service.

The records management service is located in the IT section within the Resources directorate. The Council is currently undergoing a period of structural change and review, including the creation of a new Integrated Support Service (ISS). IT and records management are included within the scope of this ongoing review, and so it is possible that, in the months following submission of this RMP to the Keeper, some changes to the line management of the service might occur. In this event, any changes would be made in line with the Council's obligations under the Public Records (Scotland) Act and in keeping with the RMP.

Electronic records management

In February 2013, the Council procured an electronic document and records management system (EDRMS), with the first phase of implementation to be completed in February 2014. The corporate roll-out of the system over the coming years will support and improve compliance with the Act, particularly in the areas of business classification and the application of retention rules, information security, and access controls.

2.0 Scope

In line with the Public Records (Scotland) Act 2011, all records created in the carrying out of Midlothian Council'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."

The RMP applies to all public records, regardless of format.

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3.0 Dissemination and Publicity

All policy documents, plans and procedures submitted as evidence as part of the RMP are made easily accessible to all staff via the Council's intranet. In addition, the RMP is published on the Council web-site.

3.1 *Records Management Toolkit*

In order to support corporate compliance with the RMP, essential guidance in the form of a Records Management Toolkit is available to all staff for download on the Council's intranet. The Toolkit includes templates, guides and procedures covering all stages of the record 'life-cycle', from creation to disposal. Further training in records and information management is also made regularly available. This is addressed in further detail in Element 12 of the RMP.

3.2 *Information Management Group*

In addition to online publication and training, information about best practice in records and information management is disseminated to Council staff via the Information Management Group (IMG). This group aims to develop an 'information management culture that ensures that data and information used by the Council is fit for purpose and meets the needs of the business,'¹ via a network of representatives at the strategic and directorate levels.

As part of the implementation of the RMP, a new Records Champion role will be created within the IMG at the directorate level, dedicated to supervising, co-ordinating and representing good records management practice within local service areas. A description of the role, remit and structure of the Information Management Group, along with the role of the Records Champion, is available for download from the Council intranet.

3.3 *ICO Audit*

In March 2013, Midlothian Council participated in a consensual audit by the Information Commissioner's Office (ICO), focusing on three areas:

- Data protection governance
- Security of personal data
- Requests for personal data

As a result of the audit, the ICO concluded that the Council's arrangements for data protection compliance provide reasonable assurance that processes and procedures are in place and being adhered to. In addition to areas of good practice, a number of areas for improvement were identified. These have been progressed via the

¹ Information Management Group (IMG) Remit, Midlothian Council, April 2013, p.1.

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Information Management Group Action Plan 2013-14, which is subject to internal audit and scrutiny by the Corporate Management Team (CMT).

Supporting documentation:

- IMG Action Plan 2013-14, as of third quarter
- [Information Management Group \(IMG\) – Remit](#)
- [Information Management Structure – Revised Jan 2014](#)
- Midlothian Council Data Protection Audit Report: Executive summary
- Records Management Toolkit v1.0

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4.0 Elements

Element 1: Senior management responsibility

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

This is a compulsory element under the terms of the Public Records (Scotland) Act: Section 1(2)(a)(i).

The Strategic Officer responsible for records management is:

Gary Fairley

Midlothian House
Buccleuch Street
Dalkeith
EH22 1DN

0131 270 7500
IMG@midlothian.gov.uk

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 Corporate Management Team (CMT).

Gary Fairley sits on the Corporate Management Team, the senior body responsible for the strategic management of the Council. In addition to his responsibility for records management, his information brief includes his role as the Senior Information Risk Officer (SIRO) and a member of the strategic Information Management Group. The records management service currently sits directly within his line of management, thus ensuring a working relationship between the strategic and operational officers responsible for records management.

Evidence:

- Signed endorsement of RMP - see above
- Diagram: Records Management at Midlothian Council
- [Information Management Structure – Revised Jan 2014 - see Introduction](#)
- [Membership and Role of CMT](#)

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Element 2: Records manager responsibility

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

This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1(2)(a)(ii)

The Operational Officer responsible for records management is:

Zarya Rathe
Records Centre
80b High Street
Bonnyrigg
EH19 2AE

0131 561 6535
zarya.rathe@midlothian.gov.uk

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 Management Group 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.

Evidence:

- [M708 Job Description](#)

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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.

This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1 2(b)(i)

The Council's Records Management Policy sets out its commitment to create high quality records within consistent corporate systems and procedures. In line with the Section 61 Code of Practice on Records Management, the policy also links records management to the Council's corporate strategy, as set out in the Single Midlothian Plan.

The policy defines the responsibilities of the Strategic and Operational Officers responsible for compliance with the Public Records (Scotland) Act 2011, identified in Elements 1 and 2 of the Records Management Plan. The current policy, effective January 2014, reflects significant expansion and updating of the previous policy, to bring it more in line with the requirements of the Public Records (Scotland) Act.

While the policy sets out the high level principles and aims of records management at the Council, not all of the procedures and guidance required to ensure full compliance are yet in place. In particular, plans for improvement regarding identification of vital records, business continuity and long-term preservation are addressed in Elements 4, 7 and 10 below. Other arrangements, such as detailed file planning, improved procedures for record creation and the linking of persistent metadata, will be included as part of the Council's corporate implementation of EDRM.

The Records Management Policy should be read with reference to the Information Management Strategy, which sets out the Council's broader information management principles and aims for the period 2013-2018. The Information Management Strategy is linked to the IMG Action Plan, which lays out key action points for the members of the Information Management Group, subject to internal audit oversight and regular reporting to the Corporate Management Team. The improvement plans for records management set out in this RMP will be managed and monitored through this governance framework, as set out in Element 13.

Evidence:

- [Records Management Policy](#)
- [Information Management Strategy 2013](#)
- IMG Action Plan 2013-14, as of third quarter - see Introduction

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Element 4: Business classification

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

Midlothian Council has adopted a corporate Business Classification Scheme (BCS) identifying its high-level functions and activities. These functions cut across the divisional structures of the Council, enabling the BCS to remain relevant in the event of structural changes to the organisation.

The BCS is a localised version of the [model BCS](#) published by the Scottish Council on Archives for use by all Scottish local authorities. This model has been chosen as the basis for Midlothian Council's classification scheme in order to promote consistency with other local authorities across Scotland, and to facilitate linking between the BCS and the Council's corporate retention schedule, which is also based on models produced by the Scottish Council on Archives. Further details about the Scottish Council on Archives BCS and retention schedules can be found on their website:

<http://www.scottisharchives.org.uk/projects/toolsstandards/retentionschedules/schedules>.

In line with the corporate implementation of the EDRMS, the business classification scheme will undergo an extended process of review as part of the development of a detailed file plan, which will be linked to record retention and disposal rules and the identification of vital records and systems.

The detailed file plan, along with the business classification scheme and retention schedule, will support the application of consistent systems and procedures for the management of all records, regardless of format, thus enabling the Council better to meet its operational and statutory requirements.

Evidence:

- [Business Classification Scheme policy document](#)
- [Combined Business Classification Scheme / Retention Schedule \(Excel version\)](#)
- EDRMS Project Plan

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Element 5: Retention schedule

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

This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1 2(b)(iii)

The Council has adopted a Corporate Retention Schedule governing how long records should be kept and what action should be taken at the end of their 'lives.'

The Corporate Retention Schedule is a localised version of the Scottish Council on Archives Records Retention Schedule (SCARRS) model. More information on SCARRS can be found on the Scottish Council on Archives website:

<http://www.scottisharchives.org.uk/projects/toolsstandards/retentionschedules/schedules>.

In order to ensure that the Retention Schedule fits the records used and generated by Midlothian Council, a modified draft version was developed in consultation with divisional representatives from the Information Management Group. This draft was posted on the Council's intranet for a six-month consultation period ending in March 2013, during which all staff were invited to review the Retention Schedule and suggest amendments.

The final version of the Retention Schedule, incorporating responses to the consultation, is included for formal corporate adoption as part of the Records Management Plan. The Retention Schedule will undergo a first review in January 2015, and will be reviewed every two years thereafter. All changes will be managed by the Records Officer in conjunction with the Information Management Group.

Evidence:

- [Corporate Retention Schedule policy document](#)
- [Combined Business Classification Scheme / Retention Schedule \(Excel version\) – see Element 4](#)

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Element 6: Destruction arrangements

An authority's RMP must include provision about the archiving and destruction, or other disposal, of an authority's public records.

This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1 2(b)(iii)

The Council's arrangements for the disposal of records are outlined in the Records Disposal Policy and associated procedures, including both the destruction of redundant records and the transfer of records of ongoing value to the historic archives. The schedule for disposal of records is set out in the Corporate Retention Schedule addressed in Element 5.

The Records Disposal Policy addresses:

- the transfer of semi-current and non-current paper records to off-site storage at the Council's Records Centre;
- the systems in place for managing the review and destruction of records in line with the Corporate Retention Schedule;
- the existing arrangements for archival transfers.

The secure destruction of records in offices is covered by the Confidential Waste Policy.

Arrangements for the systematic destruction of electronic records are in need of improvement. Currently staff are guided to register the destruction of original electronic records on local office File Registers, or alternatively to print to file. The deletion of electronic documents held on the main filing structure can be monitored, however this process will be significantly improved with the implementation of EDRM. The procured EDRM system includes the application of systematic retention and disposal procedures, as well as the permanent retention of audit tables containing essential metadata linked to the deleted records.

Evidence:

- IT Disposal Asset Report
- IT Disposal Certificate
- [Confidential Waste Policy](#)
- Disposal Sheet
- Degausser Specification
- Destruction certificates from Boxit Document Management

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- EDRMS Solution Design, pp.93-110
- Re-tek Invitation to Quote
- IT Backup System Overview
- IT Equipment Disposal Procedure
- Combined Business Classification Scheme / Retention Schedule - see Element 4
- Records Disposal Policy
- Records Disposal Procedure
- Screenshot of sample Action List
- Screenshot of Records Centre database showing destroyed record
- Completed file register for Environmental Health / Trading Standards department

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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.

This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1 2(b)(iii).

Midlothian Council maintains an in-house archive of records it creates, which also acts as a repository for special archive collections relating to the local Midlothian area. The archives' collection remit and selection criteria are listed in the Archive and Local Studies Collection Policy.

The existing arrangements for the transfer of records of ongoing value to the historic archives are addressed in the Records Disposal Policy cited in Element 6 above. Records are selected for transfer by the Records Officer, in co-operation with local Records Champions, according to the Archival Transfer Procedure, with reference to the Corporate Retention Schedule and Collection Policy. The Archives service currently does not have a digital repository, and so is unable to accept born digital records.

The Council's archiving and transfer arrangements are in need of improvement. Accordingly, the Council has committed to pursue an Archives Service Improvement Plan over the next five years, using the [TNA Archives Service Accreditation Standard](#) as a framework and guide.

Further information regarding the Local Studies and Archives service can be found on the Council web-site at: http://www.midlothian.gov.uk/info/476/local_history_and_heritage.

Evidence:

- [Archive and Local Studies Collection Policy](#)
- [Combined Business Classification Scheme / Retention Schedule - see Element 4](#)
- Records Disposal Policy - see Element 6
- [Archival Transfer Procedure](#)
- [Commitment to pursue an Archives Service Improvement Plan](#)
- Accessions Register

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Element 8: Information security

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. A public authority should have procedures in place to assess and contain that risk.

This is a compulsory element under the terms of the Public Records (Scotland) Act 2011: Section 1 2(b)(iii).

The Council's priority is to maintain a stable, reliable information infrastructure, thus ensuring business continuity by minimising the damage and impact of information security incidents.

The security policy incorporates the following key principles:

- a) Confidentiality: ensuring that information is accessible only to those authorised to have access.
- b) Integrity: safeguarding the accuracy and completeness of information and processing methods.
- c) Availability: ensuring that authorised users have access to information and associated assets when required.
- d) Regulatory compliance: ensuring regulatory and legislative requirements are met.

The Council has adopted the principles of ISO27001 and employs a full time Information Security Officer, who is a member of the main Information Management Group (see the role and remit of the IMG in the Introduction). Through the work of the Information Security Officer and the IMG, information security is integrated into the wider information management operations across the Council. A risk-based approach is taken towards information security with regular reports being submitted to the Corporate Management Team.

In addition to the Information Security Policy, the Council has in place a number of policies and procedures governing the use of IT equipment, remote working, and the security of storing and transferring paper records.

Evidence:

- Building Security Policy
- Computer Use Procedure
- Fax Procedure
- Handling Sensitive Information Procedure

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- ICT Acceptable Use Policy
- Incident Reporting Policy
- Information Security Policy
- Laptop Procedure
- Memory Stick Procedures
- Paper File Transfer Policy
- Password Procedure
- Remote Working Policy
- Sending Email Securely Procedure

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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.

Midlothian Council's commitment to safeguard personal and sensitive information about individuals is set out in the Midlothian Council Privacy Policy.

The Privacy Policy is made available to all staff via the Council Intranet, along with a number of other guidelines and procedures regarding the processing of personal and sensitive data, listed below. In order to support compliance with the Data Protection Act at all levels across the organisation, the Information Management Group also holds regular training sessions for staff. These specifically address the legislation including the eight data protection principles, information security and reporting procedures, and records management.

The Council also publishes guidance for members of the public on its website. This explains the rights of individuals under the Data Protection Act 1998 and tells members of the public how to request information the Council holds about them.

Evidence:

- [Basic Guide to Data Protection](#)
- [Generic DPA statement](#)
- [Guidance for the Individual](#)
- Information Management Training Framework
- Midlothian Council Privacy Policy
- [Subject Access Request form](#)

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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.

Business continuity plans

Midlothian Council has a number of business continuity and emergency response plans in place at both the corporate and individual service levels. At the corporate level, the Midlothian Council Strategic Business Continuity Plan and the Major Emergency Procedures Incorporating the Midlothian Council Community Recovery Plan provide the overall framework for response to and recovery from emergencies. Heads of Service and managers are responsible for designing and maintaining emergency response plans tailored to each service. The emergency plans link to several other multi-agency plans that are maintained through, but not necessarily by, the East of Scotland Resilience Coordinator and sub-groups.

The current plan, which is flexible enough to deal with a variety of emergencies, outlines the following:

- How the plan will be activated;
- Roles and responsibilities;
- Arrangements for welfare and communications;
- Arrangements for rest centres and the incident control centre (separate operational plans are in place for these aspects of our response);
- Recovery from an incident.
- 'Mission-critical' services identifying minimum requirements within <24 hours, 3 – 5 days, and 1+ week should an incident occur. 'Requirements' include staffing levels, equipment, software, hardware, alternative building location, etc.

Compliance

The Contingency Planning Group (CPG) is responsible for senior oversight of emergency planning and business continuity matters across the Council. The group, chaired by the Director of the Resources directorate, meets regularly and is made up of Heads of Service and senior managers, all of whom have a variety of technical and professional skills.

Dedicated officials known as Contingency Planning Officers (CPO's) are in place to provide advice to the Corporate Management Team and other senior managers about the principles, practice and implementation of contingency planning for Council services, buildings and other assets. They would also facilitate the decision making process during an emergency situation and ensure that all considerations are taken into account. The Risk,

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Health, Safety and Contingency Planning Manager oversees these actions and provides strategic direction, guidance and support.

In addition, the Council has a Crisis Support Team, which is made up of volunteer members of staff. During an incident, these volunteers assist, for example, by staffing a rest centre for those evacuated or helping in the Council's incident control centre. All volunteers are required to undergo appropriate training for their roles.

Both the Strategic Business Continuity plan and Major Emergency Procedures are live documents and as such they are continually reviewed and tested through workshops, events and exercises. Due to significant restructuring of the authority as a whole, the Business Continuity Plan is currently undergoing a complete re-issue, as did the Major Emergency Procedures in 2013.

Vital records

Provisions for the identification, protection and recovery of vital records are in need of improvement. While business-critical IT systems have been identified and incorporated into the IT Services Business Continuity Plan, there are currently no vital records plans identifying business-critical records across the Council. Furthermore, the existing Disaster Plan for the Council Records Centre and associated stores is insufficient and in need of review and expansion.

In order to improve provisions for vital records, the Information Management Group will work in co-operation with the Contingency Planning Group to pursue a number of actions as part of the IMG Action Plan, subject to internal audit and oversight by the Corporate Management Team:

1. To identify business-critical records across the Council and link them to the Business Classification Scheme. Identification of records will be included in file planning exercises as part of the implementation of EDRM.
2. To integrate records and information, in both paper and electronic formats, into business continuity and emergency procedures at the corporate and service levels as part of the on-going review.
3. To develop robust and comprehensive business continuity and emergency procedures for the Records Centre and associated paper stores, including the Council Archives.

Training

In order to support the development of robust business continuity plans for records, the Records Officer attended Disaster Management Training delivered by Harwell Document Restoration Services in November 2013.

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Evidence:

- *Sample service-level plan: ICT Business Continuity Plan*
 - *Application-Specific Plan: Council Tax and Benefits - Open Revenues*
 - *Testing: ICT Business Continuity Plan – Testing Strategy*
 - *Role of BCP Support Manager. BCP Support Management*
- Excerpt from BCS / Retention Schedule identifying HR vital records
- Contingency Planning Group - Note of Meeting, 16/12/2013
- Major Emergency Procedures Incorporating the Midlothian Council Community Recovery Plan
- Midlothian Council Strategic Business Continuity Plan
- Note of Meeting re: business continuity and records management, 12/12/2013

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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.

Paper records

Once a paper record enters the Council's Records Centre, every action taken on the record is tracked and logged on a Microsoft Access database. Tracked activities include initial transfer to the Records Centre, withdrawals, returns, reviews and destructions, including the names of staff withdrawing or authorising action on the file and the date of action.

In order to ensure that only those records required in the course of official business are made accessible to staff, access permissions for the Records Centre database are controlled and monitored by a core group of liaison staff within departments, who are familiar with local business needs and staff.

In order to track the movement of paper files within and between offices, a file register template is made available to all staff for download via the Intranet. File registers record essential file identity information as well as the date of destruction of records shredded in offices. They also include a tracking section where staff can 'check' records in and out of the office. File registers are held and maintained by local 'superusers' within each service area.

Electronic records

There is currently the capacity to track the creation, deletion and modification of electronic records on the Council's main file structure, as well as those held within local electronic records management systems such as ePlanning and Revenues systems. The ability to audit the movement and/or editing of records will be enhanced further as the Council implements its corporate EDRMS for better records management. The implementation of EDRM will also introduce enhanced provisions for version control, which currently is not applied consistently across the Council.

Evidence:

- Sample audit log showing all modifications to file network, 02 December 2013, 09:00-11:00
- Screenshot from Records Centre Database showing destruction authorisation
- Screenshot from Records Centre Database showing record withdrawal
- EDRMS Solution Design, pp.13-15, 53-68, 93-110 – see Element 6
- Paper File Transfer Policy – see Element 8

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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.

Midlothian Council recognises the importance of employing specialist staff in records management. The Records Officer named in Element 2 above is required to hold a postgraduate qualification in archives and records management, or to pursue one while in employment. The Records Officer also regularly liaises with other records and archives professionals through membership of the Archivists of Local Authorities Working Group (ASLAWG) and the Archives and Records Association (ARA).

The Council has a Competency Framework in place under which staff performance is measured against work-related objectives and core competencies on an annual basis. Work-related objectives specific to records management, as well as continuing professional development, are a formal element of the Records Officer's annual appraisal.

In addition, all members of the Information Management Group are required to undergo specialist training, which includes a records management component. To better and more easily allow managers to identify training needs within their teams, this training material is integrated into a larger Information Management Training Framework. The Training Framework addresses a wide range of content including data protection, records management, information security, and freedom of information. Content is delivered via a number of platforms, including face-to-face training, e-learning, Metacompliance software, and promotional campaigns.

Evidence:

- *Records Officer Competency Framework plan: 2013M708ZRPM*
- Information Management Training Framework – see Element 9
- *Records management training materials:*
 - Operational Records Management Module
 - [Records Management Training Information Sheet](#)
 - Strategic Records Management Module
- *Records Officer job description: M708 Job description - see Element 2*

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Element 13: Assessment and review

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.

The Records Management Plan (RMP), Information Management Strategy and Records Management Policy are subject to the council’s standard governance, monitoring and review process. The RMP will be formally audited and reviewed on an annual basis, as part of the Information Management Group Action Plan. The future improvements identified elsewhere in this RMP will be progressed as part of the regular assessment and review process.

Formal governance over this RMP is set out in the table below.

Governance		
Group	Governance/Scrutiny Role	Reporting Frequency
Corporate Management Team	Approval of the plan and associated strategies and policies.	Every two weeks
Main Information Management Group (m-IMG)	Developing and implementing policies and procedures relating to the plan and monitoring/reporting progress across service areas to the Corporate Management Team (CMT).	Quarterly
Directorate Information Management Groups (d-IMG)	Developing and implementing policies and procedures relating to the plan and monitoring/reporting progress across service areas to the main Information Management Group (m-IMG).	Quarterly
Directors and Heads of Service	Monitoring progress and reporting on actions, challenges and risks.	Quarterly

All service areas are required to monitor, self audit and report on performance on an ongoing basis, using a risk-based approach. Consolidated Quarterly Performance Reports are regularly published on the Council website, at:

http://www.midlothian.gov.uk/info/691/council_performance_information/122/council_performance_information/4.

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Evidence:

- IMG Action Plan 2013-14, as of third quarter - see Introduction

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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 order to protect information shared with third parties in the carrying out of its functions, the Information Management Group has recommended corporate adoption of the Scottish Accord for the Sharing of Personal Information (SASPI) as its standard information sharing protocol. A formal proposal for corporate implementation will be submitted to the Corporate Management Team in late February / early March 2014.

From 01 January 2014, the following standard records management clause is also included in all third-party contracts:

RECORDS MANAGEMENT UNDER PUBLIC RECORDS (SCOTLAND) ACT 2011

A.14.1 The Provider shall co-operate with the Council in order to ensure that the Council can meet its obligations in relation to records management under the Public Records (Scotland) Act 2011 together with any guidance issued thereon.

A.14.2 The Provider shall at all times comply with the obligations which are incumbent upon the Council as a 'public authority' in terms of the Public Records (Scotland) Act 2011 (the 2011 Act) and of all secondary legislation and guidance issued under the 2011 Act. These can be found at the National Archives of Scotland (a National Records of Scotland) website via [National Records of Scotland guidance](#) with links to the Keeper's model records management plan.

A.14.3 The Provider shall take all reasonable steps to ensure the observance of this paragraph by all its Staff, servants, employees or agents of the Provider and all subcontractors engaged by the Provider.

A.14.4 The Provider shall indemnify the Council against all losses, costs, expenses and damages and shall keep the Council indemnified against all liabilities, demands, claims, actions or proceedings incurred as a result of an alleged breach of this paragraph by the Provider.

A.14.5 The Council may monitor the Provider's compliance with the 2011 Act at periodic intervals throughout the duration of the Contract.

A.14.6 The Council may request and the Provider will supply demonstrable evidence as to how the Provider intends to secure compliance with the provisions of the 2011 Act.

This clause is a modified version of the standard clause included in National Care Home Contracts (NCHC). Prior to 01 January 2014, the NCHC clause was in use for the Council's Social Work contracts.

In addition, Midlothian Council is party to the Pan Lothian and Borders Partnership General Protocol for Sharing Information, which sets out specific arrangements and responsibilities, additional requirements, and service level agreements needed for a particular application.

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Evidence:

- Standard contract including NCHC records management clause
- Example contract signature

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