

1 PURPOSE OF REPORT

1.1 The purpose of this report is to ask the Board to approve the undernoted.

**Revised Records Management Policy
Draft Records Management Retention & Disposal Policy**

2 MAIN REPORT

The Public Records (Scotland) Act 2011 ('the Act') came fully into force in January 2013 which required LVJB to prepare and implement a Records Management Plan by Oct 2015 setting out arrangements for the management of records within the Board. The Plan is currently being reviewed by the Keeper of the Records of Scotland.

To implement the Plan the Records Management Policy was reviewed and amended and a new Records Management Disposal and Retention Policy has been drafted.

3 CONSULTATION

Discussions have taken place with Unison who have agreed to the submission of the policies.

4 FINANCIAL IMPLICATIONS

4.1 There is no financial impact.

5 ENVIRONMENTAL IMPACT

5.1 There are no adverse environmental impacts arising from this report.

6 RECOMMENDATIONS

6.1 Lothian Valuation Joint Board is recommended to approve the:-

- a) Revised Records Management Policy
- b) Draft Records Management Retention & Disposal Policy

Appendix 1 Records Management Policy

Appendix 2 Records Management Retention & Disposal Policy

Appendix 3 Records Management Plan

**Joan M Hewton
ASSESSOR & ERO**



RECORDS MANAGEMENT POLICY

CONTENTS

- 1 Policy Statement
- 2 Purpose & Scope
- 3 Records Management Overview
- 4 Importance of Records Management
- 5 Policy Statement and Commitment
- 6 Roles and Responsibilities
- 7 Legislative Framework
- 8 Relationship to other LVJB Policies
- 9 Training
- 10 Monitoring & Review

RECORDS MANAGEMENT POLICY

1 POLICY STATEMENT

- 1.1 The Assessor, on behalf of Lothian Valuation Joint Board (LVJB), carries out the functions of valuation of non-domestic properties for the purposes of the Valuation Roll; the banding of dwellings for the purposes of the Council Tax List and the Electoral Registration function for the four constituent local authorities in Lothian.
- 1.2 This policy statement sets out an overview on how the Assessor intends to manage the records created and held in the course of carrying out these functions.
- 1.3 LVJB recognises that the effective management of its records, regardless of format, is essential in order to support its core functions, to comply with legal, statutory and regulatory obligations, and to demonstrate transparency and accountability to all its stakeholders. Records are a vital information asset and a valuable resource for the organisation's decision-making processes, policy creation and operations, and must be managed effectively from the point of their creation until their ultimate disposal.

2 PURPOSE AND SCOPE

- 2.1 The purpose of this policy is to demonstrate the importance of managing records effectively within LVJB, to outline key aims and objectives in relation to recordkeeping, and to act as a mandate for the support and delivery of the records management policy, procedures and initiatives across LVJB.
- 2.2 This policy relates to all divisions and sectors of LVJB and all records created by its employees. It relates to the management of records as an internal facilitating function of the organisation and covers the records created by the organisation about its activities. It does not relate to the management of any former records that may have been transferred to an archive or no longer held.
- 2.3 The policy relates to all staff and applies to all records regardless of format or medium, including paper, electronic, audio or visual.
- 2.4 The policy is to be read in conjunction with the Records Management Plan for LVJB, which details the aims, objectives and priorities for LVJB as well as the current recordkeeping practices in place within the organisation. Such aims include the improvement of business efficiency through less time spent searching for information, increased joined up working and improved communications across the organisation as a whole; the demonstration of compliance with statutory and regulatory recordkeeping obligations including the Public Records (Scotland) Act 2011, the Freedom of Information (Scotland) Act 2002, the UK Freedom of Information Act 2000 and the Data Protection Act 1998; and the promotion of openness, transparency, accountability and good corporate governance.
- 2.5 The Public Records (Scotland) Act 2011 places an obligation on named authorities in Scotland to produce a records management plan which sets out their arrangements for the effective management of all records. LVJB is a named authority as defined in the act. The creation of a records management policy statement is a mandatory element of the plan, and is necessary in order to identify the procedures to be followed in managing the organisation's public records.

3 RECORDS MANAGEMENT OVERVIEW

- 3.1 Records management can be defined as the process whereby an organisation manages its records, whether created internally or externally and in any format or media type, from their creation or receipt, through to their destruction or permanent preservation.
- 3.2 Records management is about placing controls around each stage of a record's lifecycle, at the point of creation (through version control and naming conventions), during maintenance and use (through the management of security and access classifications, facilities for access and tracking of records), at regular review intervals (through the application of retention and disposal criteria), and ultimate disposal (whether this be recycling, confidential destruction or transfer to an archive for permanent preservation). By placing such controls around the lifecycle of a record, we can ensure they demonstrate the key attributes of authenticity, reliability, integrity and accessibility, both now and in the future.
- 3.3 Through the effective management of the organisation's records, LVJB can provide a comprehensive and accurate account of its activities and transactions.
- 3.4 We retain records that provide evidence of our functions, activities and transactions, for:
- **Operational Use** – to serve the purpose for which they were originally created, to support our decision-making processes, to allow us to look back at decisions made previously and learn from previous successes and failure, and to protect the organisation's assets and rights.
 - **Internal & External Accountability** – to demonstrate transparency and accountability for all actions, to provide evidence of legislative, regulatory and statutory compliance and to demonstrate that all business is conducted in line with best practice.
 - **Historical and Cultural Value** – to protect and make available the corporate memory of the organisation to all stakeholders and for future generations.

4 IMPORTANCE OF RECORDS MANAGEMENT

- 4.1 Information and records are a valuable corporate asset without which we would be unable to carry out our functions, activities and transactions, meet the needs of our stakeholders, and ensure legislative compliance.
- 4.2 The benefits of implementing records management systems and processes include:
- Improved information sharing and the provision of quick and easy access to the right information at the right time;
 - The support and facilitation of more efficient service delivery;
 - Improved business efficiency through reduced time spent searching for information;
 - Demonstration of transparency and accountability for all actions;
 - The maintenance of the organisation memory;
 - The creation of better working environments and identification of opportunities for office rationalisation;

- Risk management in terms of ensuring and demonstrating compliance with all legal, regulatory and statutory obligations;
- The meeting of stakeholder expectations through the provision of good quality services.

5 POLICY STATEMENT AND COMMITMENT

5.1 It is the policy of LVJB to maintain reliable and useable records, which are capable of supporting business functions and activities for as long as they are required. This will be achieved through the consolidation and establishment of effective records management policies and procedures, including:

- The development of a business classification scheme to reflect the functions, activities and transactions of LVJB.
- The review and consolidation of the retention and disposal schedule to provide clear guidance regarding the management of LVJB records.
- The review and consolidation of destruction arrangements to detail the correct procedures to follow when disposing of business information.
- The production of archive transfer arrangements in order to provide advice and guidance on how to securely transfer records to archive, if appropriate.
- The review and consolidation of information security policies and procedures in order to protect records and systems from unauthorised access, use, disclosure, disruption, modification, or destruction.
- The review and consolidation of data protection policies in order to demonstrate LVJB's commitment to compliance with the Act and the safeguarding and fair processing of all personal data held.
- The maintenance of a business continuity plan, encompassing strategies to ensure that vital records held by LVJB remain accessible over time and that there are processes in place to monitor the integrity and usability of records.
- The review of audit trail mechanisms, the potential of existing systems, review of current provision and best practice, in order to produce a clear strategy for the management of key events in a record's lifecycle (e.g. creation, access, editing, destruction or preservation).
- The identification of records management as a distinct stream within the organisation with requisite training provided to all staff.
- The completion of a self-assessment review, following the implementation of the records management plan in order to ensure that the records management practices remain fit for purpose.

5.2 It is the aim of Lothian 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. Adherence to the records management policy will be robustly monitored to ensure compliance.

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
- 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.”

6 ROLES AND RESPONSIBILITIES

- 6.1 The Assessor & ERO for LVJB has overall responsibility for LVJB's records management policy who is supported by the Records Management Group who have responsibility for ensuring compliance with this records management policy.
- 6.2 The Senior Management Group is responsible for approving a corporate approach to the management of records as defined within this policy, promoting a culture of excellent recordkeeping principles and practices in order to improve business efficiency, supporting records management through commitment and the provision of resources and recognising the importance of preserving LVJB's corporate memory.
- 6.3 The Chair of the Records Management Group is responsible for ensuring that records management practices and procedures are established in line with all legal obligations and professional standards, issuing advice and guidance to Heads of Service in order to meet the aims and objectives as outlined in the records management strategy.
- 6.4 The Depute Assessor and Heads of Service are responsible for offering advice and guidance regarding records management to all staff within their service, highlighting any records management issues or concerns to the Chair of the Records Management Group and transferring any records of historical value to an archive for permanent preservation.
- 6.5 All staff have a responsibility to manage records effectively, through the documentation of all decisions and actions made by LVJB; the effective maintenance of records throughout their lifecycle, including access, tracking and storage of records; the timely review of records and their ultimate disposal, whether this be transfer to an archive for permanent preservation, or confidential destruction or recycling.
- 6.6 All staff are responsible for suitably maintaining all records so that they can be easily retrieved, retaining all records in line with the retention and disposal schedule, ensuring that all actions and decisions are properly recorded and adhere to this policy.

7 LEGISLATIVE FRAMEWORK

7.1 The management of LVJB's records is carried out in line with the following legislative, statutory and regulatory framework. Compliance with this policy will facilitate compliance with these acts, regulations and standards.

- Public Records (Scotland) Act 2011
- Equality Act 2010
- Local Electoral Administration and Registration Services (Scotland) Act 2006
- The Environmental Information (Scotland) Regulations 2004
- Freedom of Information (Scotland) Act 2002
- Management of Health and Safety at Work Regulations 1999
- Human Rights Act 1998
- Data Protection Act 1998

8 RELATIONSHIP TO OTHER LVJB POLICIES

8.1 This policy forms part of LVJB's overall framework but specifically relates to the following legislation and policies/procedures of LVJB:

- Data Protection Act 1998
- Records Retention & Disposal Policy
- Information and Technology Management and Security Policy; incorporating;-
 - Security Operating procedures
 - Information Security Policy
 1. Acceptable Use Policy
 2. Email/Internet Policy
 3. Clean Desk Policy
 4. Password Policy
 5. Mobile Device Policy
 6. Information Handling Policy
 7. Incident Handling Policy
 8. User Management Policy
 9. Third Party Connection Policy
 10. Business Continuity Plan
 11. Access Control Policy
 12. Change Management Policy
 13. Vulnerability Management Policy
 - Network Topology
 - ER Information Asset Register
 - Data Protection Policy

9 TRAINING

- 9.1 A training programme will be provided to all staff in order to highlight and increase awareness of their responsibilities in line with data protection, freedom of information and records management. Furthermore, core competencies and key knowledge and skills required by staff with operational responsibility for records management will be clearly defined to ensure that they understand their roles and responsibilities, can offer advice and guidance, and can remain proactive in their management of record keeping issues and procedures within LVJB.

10 MONITORING & REVIEW

- 10.1 Compliance with this Policy and related standards and guidance will be monitored by the Chair of the Records Management Group in consultation with Heads of Service and the Depute Assessor. Regular reports will be submitted to the Records Management Group and Senior Management Group and updates will be disseminated to all staff when required.
- 10.2 This policy will be reviewed in one year after submission to the National Records of Scotland; at which time compliance with the Public Records (Scotland) Act 2011 will also be reviewed. Further reviews of the policy will then take place every two years in order to take account of any new or changed legislation, regulations or business practices.



RECORDS RETENTION & DISPOSAL POLICY

CONTENTS

1	Introduction
2	Purpose and Scope
3	Related Policies
4	Policy Statement
4.1	Definition of a Record
4.2	LVJB Retention Schedules
4.3	Setting the LVJB Retention Schedules' Retention Periods
4.4	Reviewing the LVJB Retention Schedules' Retention Periods
4.5	Retention and Disposal Decisions
4.6	Disposal Authority Process
4.7	Destruction Arrangements
5	Records Retention and Disposal Governance
5.1	Senior Management Team (SMT)
6	Roles and responsibilities
6.1	All Staff and Any Person Handling LVJB Information
6.2	Managers and Supervisors
6.3	Senior Managers
6.4	Records Manager
7	Staff Communication & Training
8	Implementation & Review
Appendix 1	Guidelines for the Disposal of Records
Appendix 2	Civica Disposal Module

DATA PROTECTION POLICY

1 INTRODUCTION

LVJB's records are its memory, supporting its core functions and providing evidence of actions and decisions. They are a vital LVJB asset, enabling effective management and compliance with legal and regulatory obligations.

All records created and received by LVJB in the course of its business are LVJB Information Assets and are owned by the LVJB and not by the individuals, teams, departments or services that create the records.

LVJB's Records Management Policy supports compliance with the Public Records (Scotland) Act 2011 and the Code of Practice on Records Management under Section 61 of the Freedom of Information (Scotland) Act 2002.

Effective records management requires the management of records through their lifecycle from creation to disposal. The Records Retention Policy and Disposal Authority sets out LVJB's approach to the retention and disposal of its records.

2 PURPOSE AND SCOPE

This Records Retention Policy and Disposal Authority is part of the Information Management Policy Framework and supports the Records Management Policy through setting out the roles and responsibilities of Information Asset Owners and supporting staff in making record retention and disposal decisions.

The Policy applies to any person with access to LVJB records or any LVJB Information Asset. This includes staff, contractors, agency staff, members and those working on behalf of LVJB.

3 RELATED POLICIES

This policy is complementary to and should be read in conjunction with the following

- Records Management Policy
- Data Protection Policy
- Information and Technology Management and Security Policy

4 POLICY STATEMENT

LVJB will ensure that records and information are not kept for longer than is necessary to carry out its statutory functions, service provision and community obligations whilst having due regard for legislative and evidential requirements.

4.1 Definition of a Record

The Records Management Policy sets out LVJB's agreed definition of a 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”. (The international Records Management Standard ISO 15489-1:2001)

LVJB recognises this as its definition of a record and that information includes all formats, whether paper or electronic e.g. hand written notes, letters, word documents, spreadsheets, scanned images, photographs, audio, e-mails, etc

4.2 LVJB Retention Schedule

The LVJB retention schedule is the mechanism to ensure LVJB is maintaining necessary records for the appropriate length of time. It determines the length of time records are required to be kept and provides an authority against which those records can be disposed of.

The LVJB Retention Schedule is an active management document designed to reflect the records for LVJB functions and is subject to regular monitoring and review. It promotes greater control over LVJB records, enabling Managers to dispose of records no longer needed, and ensuring the retention of appropriate records consistent with effective service delivery and LVJB’s legal and regulatory obligations.

The periods of retention for each type of record, the tools to manage the process of declaring a record and the disposal of it, together form an important part of LVJB’s Information Architecture.

The retention periods set out in the LVJB Retention Schedules must be followed by all LVJB employees.

4.3 Setting the LVJB Retention Schedule Retention Periods

In setting the retention periods for the LVJB Retention Schedules, LVJB will consider the following factors.

4.3.1 Legislation/Regulations

- Is there any legislation or regulation affecting retention of the records?
- Is the type of information likely to be required for conducting legal proceedings in the event of legal action being taken by, or against LVJB?
- Identify any particular regulatory agencies or statutes that may govern the business process generating the records.
- Identify any past/anticipated issues facing LVJB from a litigation, regulatory or compliance perspective.

4.3.2 Operational/Business Need

- How long are the records likely to be needed to carry out LVJB’s functions?
- How long are the records required for evidential purposes in respect of business processes or decision making?
- How long do the records need to be kept for accountability/internal audit purposes?
- How serious would the consequences be if they were no longer available?

4.3.3 Archival Value

- Do the records have long term historical value?
- Do the records document LVJB’s policies, structures and processes so that its activities may be understood by future generations?

4.3.4 Risk Assessment/Data Protection & Freedom of Information Legislation

What are the risks involved in keeping these records?

- Will they be liable for disclosure under the Data Protection or Freedom of Information (Scotland) Acts?
- If they contain personal data, have they served the purpose for which they were created?

Relationship with other records

- Are the records needed in order to understand or use other records? The retention periods of related records should be co-ordinated.

Financial/Resource

- Can the records be retained for a shorter period to achieve savings in storage and management costs, whilst still maintaining compliance with this policy and the Records Management Policy?

4.4 Reviewing the LVJB Retention Schedule Retention Periods

Where a Senior Manager identifies a business or legal reason for a retention period to be changed, this must be brought to the attention of the Records Management Group (RMG) and a review will be carried out in accordance with the process set out below:

- 1) The RMG will review the case for a change and seek further information on the justification for the change.
- 2) If there is a legal basis for a retention period then this will be referred to the Senior Management Group for advice.
- 3) If the retention period is based on best practice then this will be considered by the RMG and RMG will make a decision based on factors set out in 5.4 and the LVJB Retention Schedule will be updated with immediate effect.

4.5 Retention and Disposal Decisions

A delegated Senior Manager is responsible for a group of records and is accountable and responsible for authorising the disposal of records. The authority to approve disposal actions may be delegated to a nominated person who has day to day responsibility for the management of the information. In the event of the decision being delegated then the Senior Manager will remain accountable for that decision.

Retention and Disposal decisions must follow the retention periods as set out in the LVJB's Retention Schedules, unless the disposal authority process as set out below requires a period of further retention.

If the records under consideration for disposal are not clearly identified in the LVJB Retention Schedules then advice must be sought from the RMG. If there is a gap in the LVJB Retention Schedules then the review process set out below must be followed in order to create an addition entry. No disposal of records must take place unless there is an appropriate entry in the LVJB Retention Schedules.

It is also important to consider whether documents are a LVJB record or whether they are a copy. Copies of documents where the LVJB record is held by another part of the LVJB should be destroyed as soon as the business requirement for them has ended. As these documents are not considered to be a record then the retention of them is not governed by the LVJB Retention Schedules. The Senior Manager must confirm which department holds the definitive versions/originals to ensure an appropriate decision is taken.

The LVJB retention schedule sets out the action that must be taken once a retention period has expired.

Disposal actions can be:

- Archive
- Destroy
- Review

4.6 Disposal Authority Process

Prior to any disposal of LVJB's records the following steps must be undertaken.

4.6.1 Review of outstanding Requests

At the end of a record's retention period the Senior Manager or delegated representative must ensure that there are no outstanding requests for information involving that record. In particular the Senior Manager must consider whether any of the following requests have been received by LVJB.

- a. **FOI request**
- b. **Subject Access Request**
- c. **Legal Disclosure request**

4.6.2 Pending Legal Action Review

In addition to the above the Senior Manager must assess if the documents are expected to be relevant to a pending legal case. In this case legal advice should be sought to ensure that the retention beyond the period set out in LVJB's Retention Schedules is appropriate. All documents that are required for legal proceedings should be kept until the threat of proceedings has passed.

4.6.3 Final Review

The Senior Manager should consider if there is an overwhelming operational / business need to retain the records beyond the retention period identified in the LVJB's Retention Schedules. In this event, advice must be sought from the RMG and records may only be retained with the approval of the RMG.

4.6.4 Disposal

Where there are no such outstanding requests the record(s) can be disposed in accordance with the Retention schedule/policies.

4.7 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.

Destruction arrangements have been developed in line with LVJB'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 and any space limitations.

In respect of confidential paper waste, PHS Data Shredding provides Lothian VJB with an off-site shredding facility. Confidential paper waste is deposited and retained in sealable refuse sacks pending disposal or pre-shredded in a commercial shredder and similarly stored pending uplift for disposal. A certificate of destruction is provided by PHS Data Shredding, additionally a commercial shredder for in house shredding of documents was purchased in 2015 that complies with European security standard (2x15mmm particles) from destroying paper.

All digital media and IT equipment is disposed of as following:-

In the case of USB drives; hard-disks; DVDs and CDs the media shall be physically destroyed. The frequency of destruction will be stipulated in the Document Retention and Disposal Arrangements Schedule. Whilst awaiting destruction storage of the equipment shall afford a level of security no less than that when the media was in operational use. If system hardware is to be re-used, then all data and software or machine-readable media will be erased and made unrecoverable prior to reuse. If the media is to be destroyed off LVJB premises then policy requires that suitable secure arrangements are in place in relation to transport and possible overnight storage.

5 RECORDS RETENTION AND DISPOSAL GOVERNANCE

5.1 Senior Management Group (SMG)

The SMG will oversee the management of LVJB's Information Management Strategy and the implementation and Identify a person at senior level who has overall strategic responsibility for records management.

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

Responsible Officer

Joan M Hewton Assessor & Electoral Registration Officer for Lothian

To support the Assessor and Electoral Registration Officer the Senior Management Group will be responsible for approving a corporate approach to the management of records as defined within this policy, promoting a culture of excellent record keeping principles and practices in order to improve business efficiency, supporting records management through commitment and the provision of resources and recognising the importance of preserving LVJB's corporate memory. In addition the Heads of Service who are the key members of the Senior Management Group are responsible for offering advice and guidance regarding records management to all staff within their service, highlighting any records management issues or concerns to the Chair of the Records Management Group and transferring any records of historical value to an archive for permanent preservation.

Senior Management Group/Heads of Service

Graeme Strachan	Depute Assessor & Electoral Registration Officer for Lothian
Nick Chapman	Head of Valuation Services
Brian Brown	Head of Administration
Bernie Callaghan	Head of Information Communication and Technology

6 ROLES AND RESPONSIBILITIES

- 6.1 The SMG will identify a dedicated team within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation.

The dedicated team answerable to senior management and who have operational responsibility for records management within LVJB covered by the RMP is the Records Management Group:

Records Management Group

Joan Hewton	(Chairperson) Assessor and ERO
Kier Murray	ICT Development Manager
Brian Brown	Head of Administration
Gary Elliott	Divisional Assessor
Bill Kerr	Human Resources Manager
Hellen Chinnery	Technical Support Officer
Derek Cowan	Admin Manager and Audit Control

6.2 All Staff and Any Person Handling LVJB Information

- Records Management is everybody's responsibility and is something that should be considered as part of normal everyday working practice. This includes staff, contractors, suppliers, members and any person who handles LVJB's Information Assets.
- Staff and those handling LVJB information should understand the information that they create, receive and use and be able to identify information that is or may become a record. Records management processes that are in place must be followed and records keeping systems should be used in accordance with provided instructions and guidance.
- Any person handling LVJB's Information must ensure that the records for which they are responsible are accurate and are created, maintained and disposed of in accordance with the this policy, the Records Management Policy and the LVJB Retention Schedule.
- Records must not be disposed of unless this has been approved by the Senior Manager and is in accordance with the retention period as set out in the current LVJB Retention Schedule.
- The inappropriate destruction or deletion of records could result in LVJB being unable to prove that it has or has not acted in a particular way. This could, for example, have financial repercussions or leave LVJB unable to prove its case in a court of law. The destruction of a record that is the subject of an on-going request for information is likely to result in the loss of trust in LVJB, and leave it open to criticism from members of the public and the media.

- Furthermore, under Section 65 of the Freedom of Information (Scotland) Act 2002, any member of staff who alters, erases or conceals records with the intention of preventing them from being disclosed, could be found guilty of a criminal offence which carries a maximum fine of £5000.

6.3 Managers and Supervisors

- Managers are responsible for information held within their area (both paper and electronic).
- Managers and supervisors must ensure that all their staff have understood their obligations under this Policy and other information management policies. Managers should support their staff in this regard by highlighting relevant parts of policies that apply to the roles being performed by a member of staff.
- Managers and supervisors must ensure that Records are not disposed of unless this has been approved by the Senior Manager and is in accordance with the retention period as set out in the current LVJB Retention Schedules.

6.4 Senior Manager

- A Senior Manager is a person who has been identified as being responsible for a LVJB Information Asset. They must ensure that the management of their Information Asset is consistent with this policy, the Records Management Policy and the other information management policies.
- A Senior Manager must ensure they follow this policy when making a decision on the disposal of LVJB's records.

7 STAFF COMMUNICATION & TRAINING

This policy will be made available to staff through the Intranet and for others who are within the scope of the policy through the LVJB website.

As part of the core training, staff and any person handling LVJB information are provided with an online learning module that provides an introduction to the expectations LVJB places on those handling information. This includes the records management as well as the information security and data protection issues of which all staff should be aware.

All staff must complete the information management online learning module and managers must ensure that this has been completed by their staff.

Any other person handling LVJB information must also complete this training and the relevant Senior Managers within LVJB responsible for the contract must ensure this takes place.

Further online learning modules related to records management may be provided to staff and these must be completed where they are relevant to their role. Staff will be informed when they must complete these additional training modules.

GUIDELINES FOR THE DISPOSAL OF RECORDS

1 INTRODUCTION

The retention of unnecessary paper and electronic records wastes staff time, space and equipment. It can also unnecessarily incur liability to answer information requests made under the Data Protection Act 1998 and the Freedom of Information (Scotland) Act 2002, and in some instances for LVJB to be in breach of such legislation. For example, the Data Protection Act requires records containing personal data to be kept for *no longer than necessary*; and the institution can be sued for retaining unnecessary information in the event that this causes damage to someone.

In this context **disposal of records** refers to their appropriate **destruction** or disposal mechanisms when they have reached the end of their specified retention period. The appropriate retention periods and associated disposal actions are defined in **LVJB's Records Retention Schedules**.

Essentially, there are two ways of disposing of records:

- Destruction of records which no longer have value
- Records with an enduring value to the appropriate authority

2 MAINTAINING A RECORD OF DESTRUCTION

The Section 61 Code of Practice on Records Management (issued under the Freedom of Information (Scotland) Act 2002) requires that LVJB log the destruction of its records. This does not expect that the disposal of each and every document be included, but rather, the disposal of **distinct groups** or **series** of records should be recorded. For example, a record of the disposal of ephemeral or transitory material (e.g. a draft document or an e-mail of short-term significance) or convenience copies (i.e., copies made and kept for ease of reference) is not required.

Annex A provides a Disposal Template to record the removal of records for which a record of disposal needs to be retained. This form will be used and retained for a period of 10 years as part of documentation of records management practices and procedures.

3 HOW TO DISPOSE OF RECORDS

3.1 Destruction of Paper Records

To make the disposal of records a manageable process, sections should aim to have an office clear-out on a regular basis. It should be noted that Data Shred confidential bags are intended purely for day-to-day use and not for large volumes of paper. If an office clearance

is likely to generate a substantial amount of waste paper, the appropriate manager will make arrangements for secure destruction with the contractors.

3.2 Destruction of Electronic Records

As part of everyday computer use electronic records are “destroyed” by “deleting” them. However, this type of deletion does not eradicate the data which remains on the disk in a hidden form, and, if held on servers or shared drives, a back-up will be kept for a specified period. Likewise, reformatting can leave hidden data on the disk meaning it is possible to retrieve information deleted in this way.

For portable media such as an usb drive or CD/DVD, the best way to destroy the information contained is to destroy the item concerned. CD/DVDs should be broken, or scored over with a suitably sharp instrument. Items can then be placed directly into a general waste container.

In the case of information held on servers or shared drives, the responsibility for retention lies with ICT section.

4 TRANSFER OF RECORDS TO LVJB’S ARCHIVE

Records which have been identified as having long term or historical value or which require to be kept permanently, should, at present, be retained in the section which created them and advice sought from the Records Management Group.

Note: *While records should be disposed of in line with the guidance in the relevant retention schedule, it should be noted that records which are subject to a current Freedom of Information request should not be destroyed until at least 40 days after the request has been answered.*

**Template for Recording
Disposal of Records**

Disposal of Records	
Section:	
Name:	
Title of Record:	
Format:	
Reason for disposal:	
Method of disposal:	
Date of disposal:	
Authority:	
Not subject to current information request: (tick once checked)	

CIVICA DISPOSAL MODULE

Civica Disposal Module

Product Overview

The Civica Digital Solutions Disposal Module was developed to meet both Data Protection and Records Management requirements for Document and Data Retention and Disposal and enables the deletion of document and process data across all applications within the Civica Digital solution.

The module caters for the removal of data by allowing for specific document types and/or processes within defined business areas to be deleted based on an exacting set of user definable parameters.

The Module has 3 main areas for deletion: Documents, Processes and Data.

Each of these areas can have a specific Retention profile against them by application area, document type and process and other additional criteria that indicate when Disposal should take place. Additionally the module caters for the previewing and testing of documents and processes which have met defined criteria and a safeguard period to ensure complete piece of mind.

Key Functionality

Document Disposal by Document Types

The local authority can specify which Document Types will be included in the Disposal routine and also specify the required criteria for deletion. This will typically include elapsed time periods such as time since the document itself was created or last viewed, as well as criteria that may relate to the process it is attached to. Logic can also be extended to dispose of documents based on data changes in the key object record they are indexed to. For example, if a document is indexed to a planning case, delete the document 2 years after the case status equals 'Closed'.

Process Disposal

Documents may be linked to a process either because they have initiated a process or have been attached to a process; therefore it is possible to specify whether the Disposal routine will also delete the record of the associated process if the document is disposed of, subject to the criteria specified by the local authority being met. This will need to take account of the criteria being met by the process itself and any other documents attached to that process. Flexibility also exists to only dispose of processes that the document is the initiating document for.

Further control over processes may also be required. The local authority can specify which Processes will be included in the Disposal routine and specify the necessary criteria for deletion. This will typically include elapsed time periods such as time since the process was initiated, completed or aborted, as well as criteria that may relate to the documents or key object records that are attached to it.

In addition to documents and processes being deleted, there could also be a need to remove any associated Case Data. This would have the effect of removing the entire case folder from the database. This is subject to the folder containing no documents or processes that don't also meet

the criteria. It is intended that the case functionality will include Civica Contacts and then developed to individual applications on request with the first being Revenues and Benefits.

Pre-requisite

There is a requirement for data and case information to be removed from the Back Office system before any Data Synchronisation takes place. Authorities are responsible for the removal of data and case information from the Back Office systems. Please speak to your Account Manager for further details.

Complete Removal and Space Saving

Unlike many disposal systems which simply remove an image handle used to retrieve a document, but leaving an encrypted image still in existence, Civica's solution removes the copies of the image and compresses the space previously occupied. This means that in addition to meeting Records Management requirements it also aids space saving and helps manage hardware capacity.

Compression of Disk space can only be utilised by sites using Image Server 2.2. The Disposal Module can still be used for sites on Image Server 1.9 and 2.0 however only the link to the document is deleted. When the site moves from Image Server 2.1 to Image Server 2.2 the document image will then be deleted from the server.

Preview and Testing

To provide complete flexibility, the Disposal module allows the local authority to preview and test documents and processes which have satisfied the necessary criteria which would be deleted if the disposal were to run at that time. This ensures complete peace of mind as to what is being disposed of and deleted and allows for validation and an authorisation process. A reporting function is available allowing users to report on what has been disposed of.

Safeguard period

Once a document has been disposed from the Image Server it cannot be restored. Therefore, a "Safeguard period" can be specified to provide peace of mind so that the document is only deleted from the image server after a definable amount of time once the scheduler has run. Where a document has been disposed of in error but has a "Safeguard period", the document may be retrieved from a database backup.

NB: Committing the Civica Disposal routines will permanently remove access to images and/or process data, therefore customers must ensure that robust testing procedures are in place and have been followed. Civica will require formal sign-off of the testing processes before committing any deployment in the live environment and cannot accept responsibility for issues arising from testing omissions. The Civica Image Server will have a single image linked to more than one environment (Live, Test and Train) therefore suitable steps should be taken to isolate those images being used for testing to ensure no Live images are removed in error. We are currently looking into possible options to allow testing using one Image Server. However presently it is recommended that a separate Image Server linked to a test environment is provided for testing purposes to ensure images are not deleted from the Live environment in error.

Quick reference to functionality available in which version of EDM & Workflow

There are many different elements that comprise the Disposal Module and currently not all the elements are available under one release. Functionality	V15	V17	V18
Document disposal by Document Type	☐☐	☐☐	☐☐
Process disposal linked to a Document Type	☐☐	☐☐	☐☐
Process Disposal	☐☐	☐☐	☐☐
Document Disposal linked to a Process	☐☐	☐☐	☐☐
Folder/Case Disposal*	☐☐	☐☐	☐☐
Space Saving and Compression**	☐☐	☐☐	☐☐
Preview and testing facility	☐☐	☐☐	☐☐
Safeguard Period	☐☐	☐☐	☐☐



RECORDS MANAGEMENT PLAN

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

CONTENTS

- 1 Introduction
- 2 Data Protection Obligations
- 3 Records Management Systems
- 4 Records Management Plan
- 5 Elements of the Plan, 1 to 14
- 6 Contracts
- 7 Supporting Evidence

RECORDS MANAGEMENT PLAN

1 INTRODUCTION

The Public Records (Scotland) Act 2011 ('the Act') came fully into force in January 2013. The Act requires Lothian Valuation Joint Board (LVJB) 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 to be agreed with the Keeper of the Records of Scotland ('the Keeper') and reviewed by LVJB after the first year and 2 yearly thereafter.

A copy of the Act can be viewed on the 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 DATA PROTECTION

The Data Protection Act 1998 provides the overall framework within which users of personal data can operate. It requires that anybody who processes personal information (ie obtains, holds, amends, discloses or destroys data) must keep to eight data protection principles.

These principles are that personal data will:

- Be obtained and processed fairly and lawfully
- Be obtained for a specified and lawful purpose
- Be adequate, relevant and not excessive for these purposes
- Be accurate and kept up-to-date
- Not kept for longer than is necessary

- Be processed in accordance with the data subject's rights
- Be kept safe from unauthorised access, accidental loss or destruction
- Not be transferred to a country outside the EEA

LVJB is committed to adherence to the data protection principles.

More information is available on the website of the UK Information Commissioner; www.ico.org.uk

3 RECORDS MANAGEMENT SYSTEMS

LVJB uses three main types of records management systems:

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

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

4 RECORDS MANAGEMENT PLAN

LVJB'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.

LVJB'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

LVJB intends to provide the Keeper with evidence of policies, procedures, guidance and operational activity on all elements of the RMP.

The RMP is effective from 1 April 2015 and will be reviewed and updated, if required, by 30 September 2016 every two years thereafter.

5 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 LVJB covered by the RMP lies with:

Responsible Officer

Assessor & Electoral Registration Officer for Lothian	Joan M Hewton Assessor & Electoral Registration Officer Lothian Valuation Joint Board 17A south Gyle Crescent EDINBURGH EH12 9FL
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To support the Assessor and Electoral Registration Officer the Senior Management Group will be responsible for approving a corporate approach to the management of records as defined within this policy, promoting a culture of excellent recordkeeping principles and practices in order to improve business efficiency, supporting records management through commitment and the provision of resources and recognising the importance of preserving LVJB's corporate memory.

In addition the Heads of Service who are the key members of the Senior Management Group are responsible for offering advice and guidance regarding records management to all staff within their service, highlighting any records management issues or concerns to the Chair of the Records Management Group and transferring any records of historical value to an archive for permanent preservation.

Senior Management Group/Heads of Service

Depute Assessor & Electoral Registration Officer for Lothian	Graeme Strachan Depute Assessor & Electoral Registration Officer
Head of Valuation Services	Nick Chapman Head of Valuation Services
Head of Administration	Brian Brown Head of Administration Services
Head of Information Communication and Technology	Bernie Callaghan Head of ICT Services

Evidence:

- Records Management Policy
- Records Retention and Disposal Policy
- Signed letter of Senior Management Responsibility

Element 2: OPERATIONAL RECORDS MANAGEMENT RESPONSIBILITY

Identify a dedicated team within the organisation, answerable to senior management, to have operational responsibility for records management within the organisation.

The dedicated team answerable to senior management and who have operational responsibility for records management within LVJB covered by the RMP is the Records Management Group:

Records Management Group

Joan Hewton (Chairperson)	Assessor and ERO
Kier Murray	ICT Development Manager
Brian Brown	Head of Administration
Gary Elliott	Divisional Assessor
Hellen Chinnery	Technical Support Officer
Bill Kerr	Human Resource Manager
Derek Cowan	Administrative Manager : Audit Control

Evidence:

- Records Management Policy
- Signed letter of Senior Management Responsibility

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 rewritten to take into account the requirements of Public Records (Scotland) Act 2011. It is available on the Board's intranet and is publicly available on the Board's website.

LVJB'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 Lothian 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. Adherence to the records management policy will be robustly monitored to ensure compliance.

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."

LVJB 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 LVJB 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.

An audit trail is created for electronic records and this can be readily accessed from screens within the relevant application. Records may also be interrogated by the Audit Manager using dedicated audit software, or by liaison with the Board's IT section.

Evidence:

- Records Management Policy

- Information and Technology Management and Security Policy with Associated Appendices & Sub-Policies

Element 4: BUSINESS CLASSIFICATION

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

LVJB has maintained a Retention and Disposal 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 Retention & Disposal Schedule covers all functions of LVJB and has been arranged into functions, activities and transactions and includes reference to the business areas currently responsible for delivering these functions.

The Retention & Disposal Schedule includes the following information:

Function	Describes the business functions, activities and processes that records support
Activity	Further defines the business, activity or process that records support
Transaction	(type of record / information/ record description)
Disposal Trigger	Defines the event that triggers the start of the retention period
Retention Period	Specifies the length of time records must be kept following the retention disposal event
Location	Location of paper and electronic records
Confidentiality	Access rights
Authority	Identifies the legal, regulatory or business reasons that records need to be created, received and kept (even if requirements are not explicitly stated)

Heads of Service have provided their assurance that the Scheme will be implemented throughout their Service.

ICT will work with the records management group to produce a directory structure for all file servers across LVJB based on the Scheme. Work is ongoing in relation to the development of relevant file naming conventions.

Guidance on the Scheme for managing paper and electronic records will be produced and circulated prior to the Scheme being implemented corporately.

Evidence:

- Retention and Disposal Schedule

Element 5: DOCUMENT RETENTION SCHEDULE

A document 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 Retention Schedule is as an essential part of our overall Records Management Plan, ensuring that records are kept for no longer than is necessary and disposed of as appropriate.

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

The purpose of a Retention & Disposal Schedule is to provide:-

- Consistent instructions on records retention and disposal for all staff who deal with records and will underpin our Records Management programme.
- Will assist in establishing 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.
- Is intended to cover all records, regardless of medium or format, which are created or received during the course of business.

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

Installation of a Document & Data disposal for our Civica EDM system module is scheduled for later this year. This module will be configured in accordance with retention schedule requirements for data held in this area.

We are currently migrating shared network data and information into a controlled environment within SharePoint. SharePoint enables collaboration, version and access control with the ability to manage information securely.

A review of the disposal of documentation outwith SharePoint and Civica is currently being undertaken.

Evidence:

- Civica Document & Data Disposal Module
- Retention and Disposal Schedule
- Records Retention and Disposal Policy

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 LVJB records which have reached the end of their retention period and have been identified as suitable for destruction in accordance with the Retention Schedule.

The destruction arrangements have been developed in line with LVJB'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 and any space limitations.

In respect of confidential paper waste, PHS Data Shredding provides LVJB with an off-site shredding facility. Confidential paper waste is deposited and retained in sealable refuse sacks pending disposal or pre-shredded in a commercial shredder and similarly stored pending uplift for disposal. A certificate of destruction is provided by PHS Data Shredding

In addition LVJB have uses on site a paper shredder which ensures that paper records are destroyed to European security standards (2*15mm particles)

All digital media and IT equipment is disposed of in accordance with the Retention Schedule and the Information and Technology Management and Security Policy.

All members of our Administration team have attended security awareness training and confirmed via email that they understand the requirements therein. It is envisaged that this programme of training will be rolled out to our Technical divisions and refresher sessions will commence in 2016.

Evidence:

- Information and Technology Management and Security Policy
- PHS Datashred Sample Certificate of Destruction
- Retention and Disposal Schedule

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.

Limited types of documents are transferred to archive.

Architect plans for dwellings once scanned for electronic retention are uplifted by the Archivist for retention because of their historical merit and interest. The plans are not deemed sensitive or confidential and but for space requirements would normally be retained by the organisation for the life of the property plus 5 years.

Copies of the valuation roll and council tax list are provided on publication to the archivist because of historical merit and interest. The valuation roll and council tax list is also available on-line at www.saa.gov.uk. The rolls and lists are not deemed sensitive or confidential and are also retained indefinitely within the organisation for reference purposes and for public interest.

The electoral register is provided to specific organisations as determined by statute. Statute also determines the method and means of transfer of files. The electoral register is also maintained within the organisation and is open for public viewing during office hours.

Evidence:

- Retention and Disposal Schedule

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.

LVJB has produced an Information Technology Management and Security Policy which details 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 LVJB'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 LVJB's existing approved Information Security Policy and Standards.

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

All Administration staff have received information security awareness training and will be reminded of the importance of security at annually. Additionally, all relevant 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:

- Data Protection Policy
- Information and Technology Management and Security Policy

Element 9: DATA PROTECTION

An authority that handles personal information on individuals has a number of legal obligations to protect that information under the Data Protection Act 1998.

LVJB relies on the information that it collects and holds to fulfil its aims, objectives, and obligations with reference to “performing its public functions”. 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.

LVJB fully endorses and adheres to the Principles of Data Protection as detailed in the Act and has an approved Data Protection Policy in place to ensure that all personal data processing, carried out on its behalf (either in-house, by contractors, by system suppliers or partner organisations) complies with data protection principles and key legislative requirements.

As a Data Controller, LVJB 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 for the Electoral Registration Service is: **Z5952581** and for the Valuation Services is: **Z5952686**

Evidence:

- Data Protection Policy

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. Reference to records management arrangements, in particular vital records, is included in the plan. The internal Records Management Group shall help to identify vital records in the Retention 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.

To ensure the organisation can continue to operate in the event of a disaster a programme of digitising all records is underway.

An IT Disaster Recovery Plan (DRP) is currently in place for electronic records and the electoral registration service. Additionally there are ongoing arrangements to scan and retain essential property records digitally. New records are scanned for digital retention and scanning of existing records is in progress.

The senior management group reviews BCP and DRP twice yearly and keeps such matters under review.

Evidence:

- Records Management Policy
- Business Continuity Plan
- Retention and Disposal Schedule

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.

An internal audit manager carries out random checking of all key activities within the organisation and reports to senior staff monthly at Senior Management Group meetings and Technical Management Group Meetings. Findings from the audits are put to the managers and recommended solutions put forward, discussed and mainly implemented.

At present, electronic systems within the authority are able to provide audit trails for electronic records. Audit trails for paper records may be less obvious. The organisation continues to capture as many records electronically thereby improving the audit trail of as many records as possible.

The ongoing scanning of Council Tax paper files has been in place for 5 years and is expected to take another 5 years to fully capture. Changes to Council Tax Banding are all carried out electronically and are therefore fully auditable.

The ongoing capture of information for non-domestic properties has been in progress for many years, although electronic information held increases steadily paper files continue to be in regular use. Changes to Non-Domestic Rateable Values are all carried out electronically and are therefore fully auditable.

The ongoing scanning and electronic capture of Electoral Registration forms and applications has been in place for many years and is now a fully integrated system with paper files held for very short periods of time. All electoral records are fully auditable.

We are currently migrating shared network data and information into a controlled environment within SharePoint. SharePoint enables collaboration, version and access control with the ability to manage information securely.

Evidence:

- Records Management Disposal Policy

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 provides an overview of the importance of records management and details the roles and responsibilities to improve staff understanding and knowledge.

All staff within LVJB must complete online training in 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. The Records Management Plan identifies the key groups of staff that have specific functions to effectively support the business, meet corporate goals, implement best practice, ensure the organisation is accountable and comply with legislation including requirements of the Public Records (Scotland) Act 2011.

Evidence:

- Records Management Plan
- Records Management Policy

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

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

Group	Governance/Scrutiny Role
Records Management Group	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 Group	Approval of the plan and associated strategies and policies.

At present regular records management meetings are convened to monitor, self-audit and report on performance on an ongoing basis. The continued development and improvement of records management practice will be implemented through the records management group meetings.

Evidence:

- Records Management Policy

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

Evidence:

- Information and Technology Management and Security Policy

6 CONTRACTS

Prospective tenderers should note that as a Scottish Public Authority, LVJB 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 are required to be approved by the Keeper of the Records of Scotland.

It should however be noted that the PRSA only applies to third parties when they are carrying out the work of an authority, normally for reasons of cost or expertise. It does not apply when an authority contracts out a service – such as IT provision – nor when LVJB supply information to a third party to allow them to carry out their functions.

7 LIST OF SUPPORTING EVIDENCE

Specific to the 14 Elements of the Plan

Appendix A	Records Management Policy
Appendix B	Retention and Disposal Schedule
Appendix C	Records Retention and Disposal Policy
Appendix D	Data Protection Policy
Appendix E	Information and Technology Management and Security Policy
Appendix F	PHS Certificate of Destruction
Appendix G	Signed letter of Senior Authority
Appendix H	Civica Document & Data Disposal Module
Appendix I	Business Continuity Plan