

## Angus Council and Angus Licensing Board

#### Records Management Plan (RMP) and Evidence List

Demonstrating Records Management arrangements within the council and the Licensing Board under Section 1 of the Public Records (Scotland) Act 2011

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	Governance)
Owner:	Sheona Hunter, Chief Information Officer
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#### **Report Compiled by:**

Angela Dunlop Project Lead (Information Governance)

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Annex A Evidence List

#### **Document Control Sheet**

**AUTHOR:** Angela Dunlop – Project Lead (Information Governance)

**DOCUMENT TITLE:** Public Records (Scotland) Act 2011 -

Records Management Plan and Evidence List

#### **VERSION LOG**

Version	Date	Brief Summary of Changes	Author
01	3/12/2015	Draft document	Angela Dunlop Project Lead (Information Governance)
01	19/09/2016	Updated from comments by NRS staff	Angela Dunlop Project Lead (Information Governance)
01	22/12/2016	Changes in line with the Keeper's Interim report – additional information supplied	Angela Dunlop Project Lead (Information Governance)
01	17/01/2017	Further changes to text for Keeper	Angela Dunlop Project Lead (Information Governance)
02	24/4/2017	Keepers' Assessment Report submitted to IGSG	Angela Dunlop Project Lead (Information Governance)

#### 1.0 Introduction

Under the Public Records (Scotland) Act 2011 (PRSA) named public authorities across Scotland, including Angus Council (the council) and Angus Licensing Board (the board), are required to put in place appropriate records management arrangements by producing and implementing a Records Management Plan (RMP). These arrangements will show effective, efficient and systemic control of the creation, storage, retrieval, maintenance, use and disposal of records including processes for capturing and maintaining evidence. This systemic management of records is particularly significant because it will allow the organisations to:

- increase efficiency and effectiveness
- make savings in administration costs, both in staff time and storage
- support decision making
- be accountable
- achieve business objectives and targets quicker
- provide continuity in the event of a disaster
- meet legislative and regulatory requirements
- protect the interests of employees, residents and stakeholders

Angus Licensing Board is administered by Angus Council staff. In the interests of making this document more readable, references to the council should be taken as including the board wherever appropriate.

The extent of the RMP includes the management framework, policies, procedures, record management systems, technologies and tools employed within the organisation to ensure that its records are managed effectively and efficiently to be in compliance with legislation as well as satisfying business needs. This document summarises each of the elements of the PRSA and provides evidence of records management arrangements that are in place demonstrating compliance with the PRSA. This includes both corporate evidence, such as policies, procedures, standards and where applicable local application of these.

An Improvement Plan, attached to this RMP, incorporates actions for improvements. Progress in addressing these actions will be monitored by the Information Governance Steering Group.

For more information about the Public Records (Scotland) Act 2011, visit the website of the National Records of Scotland: <a href="https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011">https://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011</a>

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

#### 2.0 Structure of the Evidence List

The Evidence List identifies evidence that supports the council's RMP. Some documents are used as evidence in more than one element. To minimise duplication, only one copy of each document will be held on file. The list of evidence submitted with this RMP has been annexed as **Annex A.** 

#### 3.0 Statement of Compliance

#### Element 1: Senior management responsibility

The Chief Information Governance Officer for records management is:

Sheona Hunter
Head of Legal and Democratic Services and
Clerk to the Angus Licensing Board
Place Directorate
Angus House
Orchardbank Business Park
Forfar
DD8 1AN
Telephone 01307 476262

The Chief Executive and the Chief Information Governance Officer fully endorse this plan and will ensure that the required improvements to records management principles and procedures are implemented corporately and in an effective manner.

On 1 December 2015 the ANGUSalive trust assumed responsibility for the management and operation of a range of community facing sport, recreation, arts, heritage, archival and library services. By letter signed 26 June 2016 the trust agreed to comply with the PRSA in that they fully endorse the Records Management Plan submitted for approval.

ANGUSAlive is the only external organisation to whom Angus Council has formally outsourced a complete function. Any other contracting is for the provision of specified goods, works and services, albeit that some of these (e.g. care) are for consumption by the public directly. The council's standard conditions of contract include a section on data protection, access to and provision of information', (section 16 in the conditions for the provision of services) see link provided.

http://www.angus.gov.uk/info/20386/procurement/625/general\_conditions of contract

#### **Future Developments**

Any further changes going forward will be reflected in policies and procedures.

#### **Assessment and Review**

This element will be reviewed in the event of any relevant change in personnel, roles and/or responsibilities.

#### **Responsible Officer**

Margo Williamson, Chief Executive

#### **Evidence of Compliance Element 1**

Item 01 Statement from Chief Executive of Angus Council Item 02 Statement from Chief Information Governance Officer of Angus Council

Item 03 Statement from Chief Executive of the ANGUSalive trust

The reporting structure is detailed below. Records management policy and procedures are approved by the Information Governance Steering Group which is chaired by Sheona Hunter, (Chief Information Governance Officer), Head of Legal and Democratic Services. Angela Dunlop, Project Lead (Information Governance), chairs the Records Management Working Group. Anne Garness, Principal Solicitor, chairs the Data Protection & FOI Working Group. This two-way flow of information up and down the organisation is critical to the success of information governance. These aroups meet on 3weekly/monthly/6weekly basis with the exception of the Data Protection & FOI Working Group which meets quarterly.

## Information Governance Steering Group (monthly)

Responsible for overseeing the development of, and compliance with, the council's Information Governance policies and procedures across the organisation.

## Data Protection & FOI Working Group

Responsible for the day to day implementation and monitoring of records & information management policies and procedures and for promoting records & information management best practice across the organisation.

**Records & Information Management**,

Group

(monthly)

# (quarterly) Responsible for the day to day implementation and monitoring of Data Protection and Freedom of Information policies and

procedures and for promoting
Freedom of Information and Data
Protection best practice across the
organisation.

### Communities Directorate Res

Responsible for ensuring that any actions, issues or problems are fed to the appropriate group whilst implementing and promoting good

Directorate Records Management Working Groups

Resources Directorate monthly

### People Directorate 6 weeks

practice

Members of council staff, elected members, partner agencies, suppliers, members of the public



#### Assessment and Review of the RMP

These groups shall review the RMP on a regular basis with a formal review being carried out on an annual basis. This structure and reporting process will be reviewed in the event of any relevant change in personnel, roles and/or responsibilities, structures or legislation.

In March 2017 an <u>Assessment Report</u> was submitted by The Keeper of the Records of Scotland (the Keeper). Actions within the report will be updated and evidence of action updates will be submitted to the Keeper on a regular basis.

#### **Element 2: Records Manager responsibility**

The individual answerable to senior management within the council and who has operational and day-to-day responsibility for records management is:

Angela Dunlop
Project Lead (Information Governance)
Place Directorate
Angus House
Orchardbank Business Park
Forfar
DD8 1AE

On records management issues Angela Dunlop reports to Sheona Hunter, Head of Legal and Democratic Services/Clerk to the Licensing Board and Chief Information Governance Officer.

#### **Future Developments**

Any future changes relating to this element will be published and included in the Improvement Plan as appropriate.

#### **Assessment and Review**

This element will be reviewed in the event of any relevant change in personnel, roles and/or responsibilities.

#### Responsible Officer(s)

Sheona Hunter, Head of Legal and Democratic Services.

#### **Evidence of Compliance Element 2**

Item 01 Statement from Chief Executive of Angus Council

Item 02 Statement from Chief Information Governance Officer of Angus Council

Item 03 Statement from Chief Executive of the ANGUSalive trust

Item 04 Project Lead (Information Governance) Job Profile

#### **Element 3: Records Management Policy Statement**

A consolidated and revised Records Management Policy, reflective of the recordkeeping arrangements in place for the council as a whole, was approved by the Information Governance Steering Group on 21 September 2015. The Policy document sets out the principles and the responsibilities of information management in the council that are key to records management.

The purpose of the Records Management Policy is to define the framework by which information held by the council is managed in compliance with legislation and according to clearly defined procedures and controls governing the creation, indexing, storage, publication, use, retrieval, revision, retention and disposal of information, whatever its format. The Records Management Guidance document provides context and further information to support the implementation of the council's Records Management Policy.

The Policy and guidance have been published on the council's intranet and communicated to the Records Management Working Group for cascading to services. Angus Council's Records Management Policy is publicly available on the authority's website Records Management Policy.

The council is concentrating on getting records management processes in place, in order to provide a strong records and information management culture across the council. All areas within the council are working together to ensure that this will be the case and ongoing work relating to this is included in the Improvement Plan.

#### **Future Developments**

The council is exploring options for an Electronic Documents and Records Management System (EDRMS) as a central corporate repository and is carrying out an EDRMS Review and an EDRMS scoping exercise.

Records management is referred to in the council's e-learning course for Information Governance and a direct link to the Records Management Policy will be included in the e-learning course for Records Management that is currently being developed. Information Governance, Data Protection and Information Handling e-learning is mandatory for current staff (to be completed every two years) and is included in the induction process. Records Management training will follow the same format.

#### **Assessment and Review**

The Records Management Policy will be reviewed as required and also after each major business or technological change such as any programme, project or initiative that might affect the content of the policy therein. Other supporting guidance and procedures will be reviewed on an ongoing basis as stipulated by the Information Governance Steering Group, or whichever body replaces this group in the future.

#### **Responsible Officer(s)**

Angela Dunlop, Project Lead (Information Governance)

#### **Evidence of Compliance Element 3**

Item 05 Screen Dump AC Intranet Information Governance Item 06 Information Governance Improvement Plan Item 52 Records Management Guidance

#### **Element 4: Business classification**

The council is aware of its statutory functions and what business areas exist to administer these functions, details can be found on the angus.gov.uk website - our guide to information and classes of information.

Work is required to identify where and what types of information is routinely being created. With this in mind, the council has agreed to adopt the Local Government Classification Scheme (LGCS) as a guide for the development of its business classification scheme. The scheme is developed in a structure that supports the business activities of the authority.

The LGCS was developed by the Information and Records Management Society. Details can be found on <a href="http://www.irms.org.uk/resources/information-quides/198-local-government-classification-scheme-v203">http://www.irms.org.uk/resources/information-quides/198-local-government-classification-scheme-v203</a>

#### **Future Developments**

The council is at the very early stages of developing and implementing a business classification scheme (BCS) and this work will be systematically done in services undertaking records management projects. Services are currently working on Information Asset Registers (IAR) and whilst some are in draft these have yet to be finalised. The IARs will allow clear identification of where and how business critical vital information assets are held. Alignment of information assets will identify core functions using the corporate BCS.

Work is currently underway in different services to get their file plans in line with the council's classification scheme and work for this is reflected in the Improvement Plan. Senior managers are aware of their commitment to making this improvement and evidence of this can be found in various formats including minutes of meetings from all levels in the structure, covalent actions and emails to senior members of staff reminding them of their responsibilities.

An agreed classification scheme will be in place before services migrate any information from shared drives to any EDRMS. These developments will ensure that the classification structure remains intact with only authorised staff authorised to make approved changes to any part of the scheme.

#### **Assessment and Review**

Once the actions on this element have been completed, an assessment and review procedure will be developed and cascaded to all services within the council, for example, assessment and review will take place if there is a change in the council structure or business function. The BCS implementation and review will continue to be an action in covalent and will be reviewed in line with the Information Governance Improvement Plan.

#### Responsible Officer(s)

Sheona Hunter, Head of Legal and Democratic Services Angela Dunlop, Project Lead (Information Governance)

#### **Evidence of Compliance Element 4**

Item 04 Screen Dump AC Intranet Information Governance

Item 07 Screen Dump Covalent actions BCS

Item 06 Information Governance Improvement Plan

Item 08 Extracts from Minutes

Item 09 Business Classification Email sent to Senior Managers

Item 53 Angus Council Classification Scheme

#### **Element 5: Retention schedules**

The council has adopted the Scottish Council for Archives Records Retention Schedule (SCARRS) model. This applies to both electronic and paper records. More detailed retention schedules, based on SCARRS, have been developed by some services but it is recognised that any changes to the SCARRS retention schedules need to be signed off by senior managers.

More information on SCARRS can be found on the Scottish Archives website: <a href="http://www.scottisharchives.org.uk/scarrs">http://www.scottisharchives.org.uk/scarrs</a>.

Application of retention schedules is taking place in the EDRMS software IDOX. Retention schedules are created within a category, based on various rules and each category may have a number of rules that apply under different circumstances. Documents which meet the retention expiry dates based on these rules appear daily in the retention area and from here they can be deleted, reviewed, etc. depending on the rules assigned to them.

For records of historical value, these are transferred to the council Archive Service.

Contracts are in place with third party organisations to enable paper records to be scanned onto DVD, CDs, pen drives and external hard drives and thereafter destroyed securely.

#### **Future Developments**

Whilst SCARRS retention schedules have been adopted, it is recognised that they are not rigorously applied to all hard copy documents or information held within shared drives and business systems.

A great deal of work is being carried out to promote records management practices, with regular events being held throughout the year as well as the encouragement of day-to-day cleansing of records. That said, there is always room for improvement, and this shortcoming has been identified and highlighted within the Improvement Plan attached to this document.

#### Assessment and Review

Work in relation to the review of existing policies, and development of new policies, if required, will be monitored through the Information Governance Steering Group.

#### Responsible Officer(s)

Sheona Hunter, Head of Legal and Democratic Services Angela Dunlop, Project Lead (Information Governance)

#### **Evidence of Compliance Element 5**

Item 05 Screen Dump AC Intranet Information Governance

Item 10 Retention Schedules Legal Services

Item 11 Contract Clyde Document Imaging Limited

Item 12 Procurement Document Management

Item 06 Information Governance Improvement Plan

Item 13 Events Supporting Clear Desk - Ditch the Data - Olympic Challenge

Item 14 Archive and Transfer Arrangements		
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#### **Element 6: Destruction arrangements**

As alluded to in Element 5 the council has in place arrangements to destroy records that have been identified for destruction. The council does hold legacy files and are destroying these records in line with SCARRS and services' retention schedules and this is work in progress across the authority.

Destruction certificates are created by staff but final approval is sought from an authorised member of staff, either the owner of the records or a senior manager.

#### **Paper Records**

For paper records the council use Shred-it for the secure on-site destruction of confidential files.

Company website: http://www.shredit.co.uk/en-gb/home

Locked consoles are placed at specific locations in the offices for staff to place documents requiring secure destruction. Contents of consoles are regularly collected by Shred-it staff and destroyed on, or very close to, the council premises. Shred-it also deals with other media such as Tapes (Video, Audio, and Data) Microfiche, CDs/DVDs.

Paper not requiring secure destruction is deposited in blue recycling bins placed throughout council buildings.

The council does not use a commercial storage facility for holding records offsite.

#### **Electronic Records**

The council's corporate data is backed up on a nightly basis using an automated process of incremental backups within the CommVault backup tool. Backups are overwritten after 35 days.

With the exception of IDOX, there is no automated procedure for destruction and no automatic link to a retention schedule. There is no centralised control over information stored on / deleted from shared drives; responsibility lies with individual services. The Project Lead (Information Governance) is using Treesize to identify documents on servers which have exceeded their retention period. These reports are then shared with managers in an effort to get a better understanding of what is being held on servers and by whom. Further information around the Treesize application is attached. Work is still required in this area and this is included in the Improvement Plan attached.

#### **Hardware**

All hardware is securely disposed of by CRS, Dundee. This includes the cleansing and destruction of hard drives.

#### **Future Developments**

Standards of records destruction arrangements in line with the provisions of the PRSA, where applicable, will be built into business processes, contracts and agreements with third parties who handle or process records on the council's behalf.

Work will continue to identify documents on servers which have exceeded their retention period.

A retention and disposal facility will be included as part of requirements specifications for new systems (or upgrades to existing systems) that are procured, and again this is included in the Improvement Plan attached to this document. It is intended that this work should resolve the current shortcomings.

#### **Assessment and Review**

This element will be reviewed by the Information Governance Steering Group, or whatever body replaces this group in the future, or as required following any incident.

#### Responsible Officer(s)

Caroline Cooper, Service Manager, People Directorate Angela Dunlop, Project Lead (Information Governance)

#### **Evidence of Compliance Element 6**

Item 15 Authorisation for Records Destruction Form

Item 16 Certificates of Destruction - Legal

Item 17 Records Retention and Disposal Guidance

Item 18 Certificate of Destruction - ShredIt

Item 19 Hardware Contract data CRS

Item 20 Screen Dump Treesize report

Item 05 Screen Dump AC Intranet Information Governance

Item 06 Information Governance Improvement Plan

Item 60 Treesize evidence for RMP

#### **Element 7: Archiving and transfer arrangements**

In 2005 the Archive Service for the council relocated to the Hunter Library nearby the Restenneth Priory, which is an ancient priory church believed to have been founded by Nechtan, King of the Picts in 715. More information on the Archives Service is available on the ANGUSalive website: <a href="http://archive.angus.gov.uk/historyaa/archives/">http://archive.angus.gov.uk/historyaa/archives/</a>.

A procedure is in place for staff to transfer or access documents from the Archive Service.

There is a basic transfer form to record an initial record transfer, regardless of source. It is then entered in the day book, before being processed, numbered and added to the CALM database.

There are old paper lists for what has been transferred from Angus Council and Angus District Council. The current versions are embedded on the CALM database but it illustrates some of what is being archived.

During physical clear-outs of identified storage areas and offices, the Senior Archivist is contacted to review records identified as presenting potential historical interest. Selected records are then transferred to the Archive Service. The council will continue to, in collaboration with the archive service, identify records suitable for permanent preservation and ensure safe transfer at the end of their business life to the archive service.

#### **Future Developments**

Angus Archives collections care and conservation plan is currently in draft form.

Any future changes relating to this element will be reflected in policies and procedures and shared with council staff as appropriate.

#### Assessment and Review

This element will be reviewed in the event of any future changes around the charitable trust and the Information Governance Steering Group, or whatever body replaces this group in the future, or as required following any incident.

#### Responsible Officer(s)

Fiona Dakers, Senior Manager – Libraries, Customer & Culture, ANGUSalive trust

Fiona Scharlau, Archives Manager, ANGUSalive trust Sheona Hunter, Head of Legal and Democratic Services Angela Dunlop, Project Lead (Information Governance)

#### **Evidence of Compliance Element 7**

Item 21 Transfer to Angus Archives Form Item 22 Archived Angus Council Records Item 23 Archived Angus District Council Records

#### **Element 8: Information security**

The council has an Information Security Policy and all staff are required to comply with the Policy which is supported by a comprehensive set of complementary policies, and guidance documents.

<u>Financial Regulation 25.4</u> outlines responsibilities for information security. This is supported by more detailed policies and guidance available on the intranet, including the Information Security Policy and Information Security User Guidelines.

#### Paper records

Current paper records are stored close to staff requiring access to them in dedicated storage equipment in offices, such as filing cabinets, filing rooms, mobile racking and tambour cabinets. Some centralised filling systems have file trackers to monitor who has taken a file out of the cabinets.

The council operates a clear desk policy. Paper files must be locked away when not in use. The Physical Files Policy gives staff instructions for dealing with paper records in and out of the office.

#### **Electronic Records**

The council is PSN compliant (compliance certificate attached as evidence). The council requires that encryption is in place where personal, sensitive or confidential information is stored. All mobile devices must be encrypted.

Electronic Records are managed, as far as possible, in accordance with the lifecycle principles applied to the management of paper records. Electronic records are part of the information resources for all council services and include records held within document management systems and shared drives.

All new document management systems used by the council must include electronic records management functionality and be capable of providing for the archiving of electronic records.

Information security is covered at induction through the E-induction: Data Protection and Handling Information Correctly course and the Information Governance course. Both courses are part of the council induction process and are mandatory courses which staff are required to carry out every two years.

#### **Future Developments**

Any further future changes relating to this element will be reflected in policies and procedures and shared with council staff as appropriate.

Financial Regulations are currently under review. Regulation 25.4 will be revised to refer to all information held, and not just IT related information.

The Information Security Policy and IT Security Policy will be combined in a single comprehensive Information Security Policy. The Information Security user Guidelines will be updated in light of recently approved guidance about changing network logins from a password to a passphrase.

#### Assessment and Review

This element will be reviewed by the Information Governance Steering Group, or whatever body replaces this group in the future, or IT staff as appropriate. Information security may be subject to audit as part of annual audit plans. Two audits were completed as part of the 2015/16 Internal Audit Plan. See attached evidence.

#### Responsible Officer(s)

Caroline Cooper, Service Manager, People Directorate Angela Dunlop Project Lead (Information Governance)

#### **Evidence of Compliance Element 8**

Item 24 Information Security Policy

Item 05 Screen Dump AC Intranet Information Governance

Item 25 Screen Dump AC Intranet Information Technology

Item 26 File Out Form

Item 27 Legal&Dem Records Management Clear Outs

Item 08 Extracts of Minutes

Item 28 Screen Dump E-Learning Data Protection and Handling Information

Correctly and E-Learning Information Governance

Item 29 Internal Audit 15-23 Information Governance Data Security

Item 30 Internal Audit 15-26 IT Security

Item 54 Physical Files Policy

Item 58 PSN Compliant Certificate

Item 61 Password Policy Guidance - Passphrase

Item 62 IT Security Policy

Item 63 Information Security - User Guidelines

#### **Element 9: Data Protection**

In order to deliver services to the various communities in Angus, the gathering and processing of personal data about residents, staff and other individuals is necessary. The council has a legal obligation to comply with the requirements of the Data Protection Act 1998, ("the Act") in relation to the management, processing and protection of personal data and sensitive personal data as defined in the Act. The council's data protection practices demonstrate the organisation's commitment to compliance with the Act and the safeguarding and fair processing of all personal data held. The council is listed on the Data Protection Register of Data Controllers held by the Information Commissioner's Office. An online training course is provided to all staff in order to ensure that they are aware of their responsibilities in managing, processing and protecting personal data. This training was made mandatory for all staff and the training is via an on-line course with a short test. Staff undertake this e-learning training at induction and every two years thereafter.

Angus Council data protection practices are publicly available on the authority website at angus.gov.website Data Protection.

The council's registration number in the Data Protection Register is Z4842744. This registration includes "Licensing and Regulatory activities" and thus incorporates the activities of the board. This can be viewed on the Information Commissioner's website, <a href="https://www.ico.org.uk">www.ico.org.uk</a>.

#### **Future Developments**

There are plans to create and distribute a training needs analysis for data protection and information security before the end of 2016. The results of this will ensure that the training remains relevant and fit for purpose. The programme will be monitored by the Data Protection and Freedom of Information Working Group or whichever body replaces this Group in the future.

#### **Assessment and Review**

Policies will be reviewed as stipulated by the Data Protection and Freedom of Information Working Group, or whichever body replaces this group in the future, ensuring they remain accurate and up to date. The Data Protection register entry will be renewed 24 April 2017 and regularly monitored and updated as necessary.

#### Responsible Officer(s)

Sheona Hunter, Head of Legal and Democratic Services Anne Garness, Principal Solicitor Angela Dunlop Project Lead (Information Governance)

#### **Evidence of Compliance Element 9**

Item 31 Screen Dump AC Intranet Data Protection Guidance Item 28 E-Learning Data Protection and Handling Information Correctly Item 55 Data Protection "Guide for Employees" Item 56 Data Protection Leaflet for Employees

#### Element 10: Business continuity and vital records

The council has a number of Business Continuity Plans (BCPs) and procedures in place which are reviewed regularly and updated as required. BCPs are subject to regular annual review by business continuity co-ordinators in each service that have been identified and trained. In addition the council's strategic business continuity action plan, which refers to the operational plan, and a full training and exercising plan is managed by the council's resilience manager and submitted to the council's management team.

All business continuity plans are submitted on the agreed template and quality assured against ISO 22301 at the outset, which provides a standardised and consistent approach to assessment of all plans. On completion of the initial plan, it is tested and exercised to ensure staff are familiar with the content and that the plan is fit for purpose, with full exercise reports provided. Further testing and exercising is then undertaken over a three year cycle as part of the training and exercising plan.

#### **Future Development**

Any future changes relating to this element will be reflected in policies and procedures and shared with council staff as appropriate.

#### Assessment and Review

BCPs are subject to regular review through the council's management team and the resilience manager. Business continuity may be subject to audit as part of annual audit plans. The most recent audit was completed as part of the 2015/16 Internal Audit Plan.

#### Responsible Officer(s)

Jacqui Semple, Resilience Manager Angela Dunlop Project Lead (Information Governance)

#### **Evidence of Compliance Element 10**

Item 32 BCP Risk Management Guidance

Item 33 Risk Management Guidance

Item 34 Risk Management Strategy 2016

Item 35 Internal Audit 15-16 Business Continuity Planning

Item 36 Business Continuity Plan - Property

Item 37 Business Continuity Plan – Schools

Item 57 Corporate Business Continuity action plan

#### Element 11: Audit trail

The council has a number of systems, which are used to store information. Most of these systems are integral to business systems and are used to store information generated by that system. The three main document/records management systems are IDOX, SharePoint and Civica. The systems are used in various ways to store and manage individually created documents/records.

Where an EDRMS is in use, the system provides electronic audit trail and version control as evidence of saving, modifying and deletion of records.

Archiving procedures ensure that paper records are tracked from local storage to long term archive preservation within the Archivist Service.

The council has a Physical Files Policy and examples of procedures required to meet the policy include: within legal, paper files have a check out card which must be signed by the person removing the file so that it is clear who has removed the file and when it is returned. Also within our staffing and payroll section there is a system in place for the moving around of staffing files, and within schools there is a process for moving pupil files. See evidence below.

In the past, staff were unsure of the use and importance of metadata and a guidance note has been placed on the Guidance Notes area of the Information Governance SharePoint area which is open to all staff.

#### **Future Developments**

Any future changes relating to this element will be reflected in policies and procedures and shared with council staff as appropriate. The Records Management Policy, Naming Convention Guidance and the use of metadata will be addressed in the records management training which is currently being developed. The council recognises that there is no audit trail available for documents held on shared drives and this is will be addressed by the EDRMS project.

#### Assessment and Review

This element will be reviewed by the Information Governance Steering Group, or whatever body replaces this group in the future, or IT staff as appropriate

#### Responsible Officer(s)

Sheona Hunter, Head of Legal and Democratic Services Caroline Cooper, Service Manager Angela Dunlop Project Lead (Information Governance)

#### **Evidence of Compliance Element 11**

Item 05 Screen Dump AC Intranet Information Governance Item 38 Screen Dump Various systems - Audit Version Control

Item 39 Screen Dump Sharepoint – Metadata Note Item 26 File Out Form Item 06 Information Governance Improvement Plan Item 14 Archive and Transfer Arrangements Item 40 Pupil Transfer Files Guidance Item 54 Physical Files Policy Item 59 Audit Trail Civica System

#### Element 12: Competency framework for records management staff

The council recognises that records management is an entirely separate function from general office duties and acknowledges the importance of records management principles and practices. Senior management recognise the importance of the continued development of staff with records management responsibilities within services and is open to staff attending regular seminars and conferences for continuing professional development (CPD). This is mainly achieved by staff attending various conferences organised by the Information and Records Management Society (IRMS) amongst others. There are many opportunities offered to the Project Lead (Information Governance) as listed in evidence provided.

The council currently provides corporate support across the organisation on managing electronic and hard copy records through various e-learning courses and provides information on the council intranet in accordance with its business requirements and the council's responsibilities under the PRSA.

The council are looking to include further corporate training for records management to be made available on the council's learning and development site and this is included in the Improvement Plan attached to this document.

#### **Future Developments**

A compilation of online training courses will be provided for council staff to ensure consistency and accuracy with regard to records and information management across the organisation. The Project Lead (Information Governance) will continue to attend events relating to information governance and PRSA etc.

#### Assessment and Review

The Records Management Group will regularly review the requirements for records and information management training once a suite of core courses have been created.

#### Responsible Officer(s)

Sheona Hunter, Head of Legal and Democratic Services Angela Dunlop, Project Lead (Information Governance) Sharon Faulkner, Head of HR, IT and Organisational Development

#### **Evidence of Compliance Element 12**

Item 04 Project Lead (Information Governance) Job Profile

Item 41 Project Lead (Information Governance) Attendance Events/Training

Item 28 Screen Dump E-Learning Handling Information Correctly and E-Learning Information Governance

Item 42 Screen Dump E-Learning Using the Council's IT systems

Item 06 Information Governance Improvement Plan

#### Element 13: Assessment and review

The council will review the plan regularly to ensure that the provisions contained in it remain fit for purpose. The format for assessing and reviewing the plan will be determined by the Information Governance Steering Group. Review and will be led by the Chair of the Information Governance Steering Group at the time. Please see Element 1 for reporting and review structure.

An Improvement Plan has been attached to this document and it will help in the review of the relevance of the RMP. This information will be provided to the various Heads of Service within the council for monitoring purposes.

A compliance framework is currently being developed by the Project Lead (Information Governance) and audit colleagues. Internal audit have carried out a number of reviews - see evidence attached. Information governance/management is included in the 2016/17 internal audit plan.

Assistance will be offered to services where records management advice is required.

#### **Future Developments**

A self assessment on compliance with PRSA, both corporately and for services is to be developed and put in place with appropriate responsibilities and reporting. The Internal Audit Service may be notified if major issues with non-compliance are found. Angus Council have access to the 'ARMS Toolkit' Online Self-Assessment Tool (owned by the Scottish Council on Archives) which is a comprehensive assessment tool that has been endorsed by the Keeper.

The Information Governance Steering Group is taking on the responsibility of monitoring the development of the RMP and compliance with the Improvement Plan.

#### **Assessment and Review**

The assessment and Review process will be agreed and then reviewed by the appropriate body on a yearly basis.

#### Responsible Officer(s)

Members of the Information Governance Steering Group

#### **Evidence of Compliance Element 13**

Item 43 ARMS Toolkit registration
Item 06 Information Governance Improvement Plan

#### **Element 14: Shared Information**

A General Information Sharing Protocol supported by Individual Protocols was first developed as part of the Joint Future Initiative. Parties to the Protocol are NHS Tayside, Perth & Kinross Council, Dundee City Council and Angus Council. The protocol has been further developed following the recent Health & Social Care integration. A copy of the current protocol is attached as evidence (Item 44).

The council has a Register of Information Sharing Agreements.

#### **Future Developments**

Any future changes relating to this element will be reflected in joint protocols and shared with council staff as appropriate.

#### **Assessment and Review**

The protocols will continue to be developed as joint working with NHS through the Angus Health & Social Care Partnership progresses and will be formally reviewed on an annual basis.

Data sharing agreements will be managed more effectively through the centrally held Data Sharing Agreements Register as detailed in the Information Governance Improvement Plan.

#### Responsible Officer(s)

Sheona Hunter, Head of Legal and Democratic Services Angela Dunlop, Project Lead (Information Governance)

#### **Evidence of Compliance Element 14**

Item 44 Information Sharing Protocol in relation to Health and Social Care Integration

Item 31 Screen Dump AC Intranet Data Protection

Item 45 Employee request to View Personal Information

Item 46 Councillors request to View Personal Information

Item 47 Personal Files and Employee Information

Item 48 Pupil Transfer Form

Item 49 Police Info Sharing Form

Item 50 Data Sharing Agreement - Tayside Police

Item 51 Social Work Access to Records

Item 06 Information Governance Improvement Plan

#### ANNEX A: EVIDENCE SUBMITTED

Please find a list of evidence submitted in support of each of the elements of the Records Management Plan below.

Evidence Item ref no:	Details:	In support of Element (s):
01	Statement from Chief Executive of Angus Council	1,2
02	Statement from Chief Information Governance Officer of Angus Council	1,2
03	Statement from Chief Executive of the ANGUSalive trust	1,2,4
04	Project Lead (Information Governance) Job Profile	2,12
05	Screen Dump from Angus Council (AC) Intranet	3
	Records Management Policy	3,11
	Records Management guidance	3,11
	Managing your records	3,5
	Information Governance Strategy	3
	Naming Convention Guidelines	11
	Physical Files Policy	8, 11
	Angus Council Classification Scheme	4
	Information Asset Register guidance	4
	Retention Schedules	5,11
	Records Retention and Disposal guidance	5,6,11
06	Information Governance Improvement Plan	3,4,5,6,11,1 2,13, 14
07	Screen Dump Covalent Business Classification Scheme actions	4
08	Extracts from Minutes	4, 8
09	Business Classification email sent to Senior Managers	4
10	Retention Schedules – Legal services	5
11	Contract Clyde Document Imaging Limited	5
12	Procurement Document Management	5
13	Events Supporting Clear Desk - Ditch the Data - Olympic Challenge	5
14	Archive and Transfer Arrangements	5, 7, 11
15	Authorisation of Records Destruction Form	6
16	Certificate of Destruction Legal	6
17	Records Retention and Disposal Guidance	6
18	Certificate of Destruction ShredIt	6
19	Hardware Contract data CRS	6
20	Screen Dump Treesize Report	6
21	<u>Transfer to Archives Form</u>	7
22	Archived Angus Council Records	7
23	Archived Angus District Council Records	7
24	Information Security Policy	8
25	Screen Dump AC Intranet Information Technology	8
26	File Out Form	8,11
27	Legal & Democratic Records Management Clear outs	8
28	Screen Dump E-Learning Data Protection and Handling Information Correctly and E-Learning Information Governance	8, 9,12

Evidence Item ref no:	Details:	In support of Element (s):
29	Internal Audit 15-23 Information Governance Data Security	8
30	Internal Audit 15-26 IT Security	8
31	Screen Dump AC Intranet Data Protection Guidance	9, 14
32	BCP Risk Management Guidance	10
33	Risk Management Guidance	10
34	Risk Management Strategy 2016	10
35	Internal Audit Report 15-16 Business Continuity Planning	10
36	Business Continuity Plan – Property	10
37	Business Continuity Plan – Schools	10
38	Screen Dump various systems Audit and Version Control	11
39	Screen Dump Sharepoint Metadata Note	11
40	Pupil Transfer Files Guidance	11
41	Project Lead (Information Governance) Events and Training	12
42	Screen Dump E-Learning Using the Council's IT systems	12
43	ARMS Toolkit registration	13
44	Information Sharing Protocol in relation to Health & Social Care Integration	14
45	Employee Request to View Personal Information	14
46	Councillors Request to View Personal Information	14
47	Personal Files and Employee Information	14
48	Pupil Transfer Form	14
49	Police Information Sharing Form	14
50	Data Sharing Agreement – Tayside Police	14
51	Social Work Access to Records	14
52	Records Management Guidance	3
53	Angus Council Business Classification Scheme	4
54	Physical Files Policy	8, 11
55	Data Protection "Guide for Employees"	9
56	Data Protection Leaflet for Employees	9
57	Corporate Business Continuity action plan	10
58	PSN Compliant Certificate	8
59	Audit Trail Civica System	11
60	Treesize evidence for RMP	6
61	Password Policy Guidance - Passphrase	8
62	IT Security Policy	8
63	Information Security – User Guidelines	8