



### Records Management Plan

**Date of meeting** 12 August 2016

**Date of report** 25 July 2016

#### Report by Assistant Chief Executive (Business Support)

#### 1. Object of report

To advise the Partnership of SPT's Records Management Plan, which will be subject to review by The Keeper of the Records of Scotland over the autumn of 2016, prior to seeking approval.

#### 2. Background

SPT is required in terms of Section 1 of the Public Records (Scotland) Act 2011 to produce a Records Management Plan setting out proper arrangements for the management of its records and to submit this to The Keeper of the Records of Scotland for approval.

The Records Management Policy, which was approved by the Partnership at its meeting on 3 May 2013, underpins the effective management of the Partnership's records and information and is an essential element of the Records Management Plan.

Effective records management brings substantial benefits to SPT, which results in greater business efficiency and considerable improvements in the use of information as well as financial, human and other resources within the organisation.

In preparing to submit the Records Management Plan for approval to The Keeper, a self-assessment review has also been undertaken to ensure that SPT fully utilises and gains from having a robust and effective Plan. The results of the self-assessment are shown in the Plan as "future developments".

The scope of the Records Management Plan applies to all records, irrespective of the technology used to create and store them or the type of information they contain.

With regard to Element 5 (Retention Schedules) of the Records Management Plan, the Partnership previously approved (in June 2011) the "Management Framework" for the disposal/retention of information held by the Partnership. These retention periods were reviewed recently and have been updated again as at June 2016.

#### 3. Conclusion

As required, SPT has prepared a Records Management Plan, but has also critically reviewed this Plan in terms of future developments. This Plan will now be submitted to The Keeper of the Records of Scotland for approval.

## 4. Partnership action

The Partnership is recommended to note:

- that a Records Management Plan has been produced and assessed against considered “best practice”; and
- that this will now be submitted to The Keeper of the Records of Scotland for consideration and approval.

## 5. Consequences

Policy consequences	<i>None.</i>
Legal consequences	<i>Compliance with the Public Records (Scotland) Act.</i>
Financial consequences	<i>None.</i>
Personnel consequences	<i>None.</i>
Equalities consequences	<i>None.</i>
Risk consequences	<i>Self-assessment against best practice to minimise risk.</i>

<b>Name</b>		<b>Name</b>	
<b>Title</b>	<b>Assistant Chief Executive (Business Support)</b>	<b>Title</b>	<b>Chief Executive</b>

For further information, please contact Valerie Davidson, Assistant Chief Executive (Business Support) on 0141 333 3298.



**Strathclyde Partnership for Transport**

# **Records Management Plan**

**Setting out the Partnership's arrangements for the management of SPT's public records under Section 1 of The Public Records (Scotland) Act 2011**

## Document Version Control

Records Management Plan	Group or Name(s) & Designation(s)	Date	Version
Author:			
Owner:			
Approved by:			
Reviewer/Update:			

Changes to the document (e.g. as part of annual review or following a change to elements) should be approved by the Strategy Group.

## Contents

1.	Introduction	Page 4
2.	Records Management Plan	Page 4
3.	Elements	Page 5
4.	List of Appendices and Associated Evidence	Page 19

## **Introduction**

SPT is required in terms of Section 1 of the Public Records (Scotland) Act 2011 to produce a Records Management Plan setting out proper arrangements for the management of its public records and to submit this to the Keeper of the Records of Scotland for approval.

Records Management is the systematic control of an organisation's records (in this document a "record" means anything in which information is recorded in any form including, for example, paper and electronic reports, emails, photographs, etc.) throughout their lifecycle in order to meet operational business needs, statutory and fiscal requirements, and community expectation. It allows fast, accurate and reliable access to records, whilst ensuring the timely destruction of redundant information and the identification and protection of vital and historically important records.

The Partnership believes that effective records management will bring substantial benefits to SPT, which will result in greater business efficiency and considerable improvements in the use of information as well as financial, human and other resources within the organisation.

The scope of the plan applies to all records irrespective of the technology used to create and store them or the type of information they contain.

## **Records Management Plan**

SPT's Records Management Plan is based on the Keeper of the Records of Scotland's published Model Records Plan and comprises the following 14 elements:-

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

## Element 1: Senior Management Responsibility

Identify an individual at senior level who has overall strategic responsibility for records management

- 1.1 The Senior Manager within SPT with overall strategic responsibility for records management is:

Valerie Davidson  
Assistant Chief Executive (Business Support)  
Strathclyde Partnership for Transport  
131 St Vincent Street  
Glasgow  
G2 5JF

Tel: 0141-333-3298

- 1.2 The Chief Executive fully endorses this plan and will ensure the required improvements to records management procedures are implemented corporately and monitored by the designated officers through the assessment and review process.

### **Evidence:**

1. Covering letter from the Chief Executive of SPT.
2. Records Management Policy (Reviewed April 2016).

### **Future Development:**

There are no planned future developments for Element 1. However, if there is a change to the Senior Responsible Officer, this element would require review.

## Element 2: Records Manager Responsibility

Identify an individual within SPT, answerable to senior management, to have day-to-day operational responsibility for records management within SPT

- 2.1 The individual answerable to Senior Management within SPT and who has operational responsibility for records management is:

Mary Frances O'Neill  
Senior Legal Advisor  
Strathclyde Partnership for Transport  
131 St Vincent Street  
Glasgow  
G2 5JF

Tel: 0141-333-3763  
Email: [MaryFrances.O'Neill@spt.co.uk](mailto:MaryFrances.O'Neill@spt.co.uk)

- 2.2 The individual who, under the supervision of the Senior Legal Advisor, has day to day responsibility for records management is:

Valerie Bowen  
Senior Committee Officer  
Strathclyde Partnership for Transport  
131 St Vincent Street  
Glasgow  
G2 5JF

Tel: 0141-333-3130  
Email: [Valerie.Bowen@spt.co.uk](mailto:Valerie.Bowen@spt.co.uk)

### Evidence:

1. Covering letter from the Chief Executive of SPT.
2. Records Management Policy.
3. Extracts from Senior Legal Advisor and Senior Committee Officer Job Descriptions.

### Future Development:

There are no planned future developments for Element 2. However, if there were to be changes to these designations, this element would require review.



### Element 3: Records Management Policy Statement

The records management policy statement underpins the effective management of SPT's records and information. It demonstrates to employees and stakeholders that managing records is important to SPT and serves as a mandate for the activities of the Records Manager

3.1 SPT's Records Management Policy is available on both its intranet and internet sites.

#### **Evidence:**

1. Records Management Policy.
2. IT and Information Security Policy.

#### **Future Development:**

An information management strategy/digital strategy is under development and will further strengthen SPT's records management approach.

#### **Element 4: Business Classification**

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

- 4.1 SPT is developing a Business Classification Scheme based on departmental filing hierarchies. Separate retention schedules have been developed.

#### **Evidence:**

1. Overview of the organisational business classification.

#### **Future Development:**

The Business Classification Scheme is being embedded. Electronic Records Management Database and retention schedule arrangements are subject to review.

## Element 5: Retention Schedules

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

- 5.1 Permanent retention of records of enduring value will be dealt with by SPT on an ad-hoc basis – see attached minute of SPT's Strategy Team.

### **Evidence:**

1. Extract from Minute of Strategy Team meeting.
2. IT and Information Security Policy.

### **Future Development:**

A Working Group is developing a strategy for electronic records management and thereafter a commitment to creating a set of business rules for staff (subject to review).

The Retention Schedules are dynamic documents which evolve to reflect organisational change.

## Element 6: Destruction Arrangements

It is not always cost-effective or practical for an organisation to securely destroy records in-house. Many organisations engage a contractor to destroy records and ensure the process is supervised and documented

- 6.1 Destruction of records occurs at the end of retention periods as set out in SPT's Retention Schedules. SPT has a number of destruction arrangements in place. For the purpose of the Records Management Plan destruction or destroyed means either the destruction of paper records or the deletion of electronic records.
- 6.2 In addition to the contractual arrangements specified in the evidence section, SPT uses on-site paper/CD/DVD shredders which ensure that paper and optical media is destroyed to European Security Standards.
- 6.3 SPT does not utilise off-site storage of records.

### **Evidence:**

1. Contract between SPT and Shred-it.
2. In house shredders specifications.
3. Certificate of Destruction from External Contractors (Shred-it).
4. ICT Equipment Disposal Policy.
5. IT and Information Security Policy.
6. Intranet articles:
  - Learning to De-clutter;
  - Information Security at work;
  - IT Security Survey Results;
  - Data Protection Policy.

### **Future Development:**

A Working Group is developing a strategy for electronic records management and thereafter a commitment to creating a set of business rules for staff (subject to review).

## Element 7: Archiving and Transfer Arrangements

This is the mechanism by which an organisation transfers records of enduring value to an appropriate archive repository, specifying the timing of transfers and other terms and conditions

- 7.1 The arrangements for archiving records of enduring value will be dealt with on an ad-hoc basis depending on the nature of the records.
- 7.2 Engage with Glasgow City Council archivist (gifting arrangement already in place).

### **Evidence:**

1. Extract from Strategy Team Meeting.
2. Agreement between SPT and the Scottish Railway Preservation Society dated 13 January 2015.
3. IT and Information Security Policy.

### **Future Development:**

There are no planned future developments for Element 7. However, this policy will be regularly reviewed to ensure it remains fit for purpose.

## Element 8: Information Security

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

8.1 SPT operates an information security management system in accordance with the international standard ISO 27001. SPT's IT and Information Security Policy is in line with this standard and provides a framework for all services.

All staff receive information security awareness training and are reminded of the importance of security via SPT's intranet.

In addition SPT has in place an Internet and Email Policy, an IT User Guide and a Data Movement Guide.

### **Evidence:**

1. IT and Information Security Policy.
2. Internet and Email Policy.
3. IT User Guide.
4. Data Movement Guide.
5. Intranet articles:
  - IT and Information Security Policy;
  - IT User Guide;
  - Learning to De-clutter;
  - Information Security at work;
  - IT Security Survey Results;
  - Data Protection Policy;
  - Freedom of Information guidance;
  - Social Media Best Practice;
  - Policy on Disclosure Information.

### **Future Development:**

Information security arrangements, including all staff communications and training, will continue to be developed.

## Element 9: Data Protection

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

- 9.1 Under the Data Protection Act 1998 SPT is a data controller and is registered as such with the Information Commissioner's office (ICO).
- 9.2 SPT has a data protection policy in place as well as a detailed policy on information security.
- 9.3 Members of the public are made aware of their right to submit a subject access request through the Data Protection Policy published on the SPT website.

### **Evidence:**

- 1. Data Protection Public Registration.
- 2. Data Protection Policy.
- 3. IT and Information Security Policy.
- 4. Data Protection Information Notice.

### **Future Development:**

There are no planned future developments for Element 9. However, this policy will be regularly reviewed to ensure it remains fit for purpose.

Continuation of Data Protection training rolled out.

## 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 organisation

10.1 All SPT departments are required to have in place business continuity plans in the event of any disaster. Reference to records management arrangements, in particular vital IT applications and systems, has been included in each plan.

10.2 The list of vital IT applications and systems will be revised and updated not less than annually.

### **Evidence:**

1. List of vital IT applications and systems.
2. IT and Information Security Policy.
3. Business Continuity Plan.

### **Future Development:**

Business Continuity Plan will be subject to review and testing to ensure it remains fit for purpose.



## Element 11: Audit Trail

An audit trail is a sequence of steps documenting the processing of a transaction flow through an organisation resulting from activities such as communications and requests by individuals, systems or other entities

- 11.1 Electronic files are maintained and archived in accordance with relevant departmental filing hierarchy.
- 11.2 Electronic systems within SPT are able to provide audit trails for electronic records. Where appropriate, audit trail for paper files are in place. (e.g. Procurement contracts files and Legal Services)
- 11.3 Where paper documents require wet signatures (i.e. Committee papers) the final version of reports to be considered by the Partnership are signed by at least two members of senior management team.

### **Evidence:**

- 1. Sample Partnership report.
- 2. Destruction certificate (IT assets).

### **Future Development:**

Information systems are subject to review.

## 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

12.1 SPT will provide appropriate training and development support to ensure all staff are aware of their records management responsibilities.

### **Evidence:**

1. Details of training/courses attended by designated officers.
2. Extract from Senior Legal Advisor and Senior Committee Officer Job Descriptions.
3. Records Management Policy.
4. Working group meetings.

### **Future Development:**

All staff responsible for operational records management will be afforded the opportunity to attend any relevant courses, seminars or conferences as and when required.

### Element 13: Assessment and Review

Regular assessment and review of records management systems will give an organisation a clear statement of the extent that its records management practices conform to the Records Management Plan as submitted and agreed by the Keeper

- 13.1 Records are revised in accordance with the timescales set out in the Records Retention schedules.
- 13.2 Records management systems will be subject to regular self-assessment and review.

#### **Evidence:**

- 1. Working group meetings.
- 2. Strategy group meeting(s).
- 3. Internal Audit (for inclusion in Annual Internal Audit Plan).

#### **Future Development:**

Assessment and review of the Records Management Plan will be reported to the Working Group and Strategy Group (and, where appropriate, the Partnership).

#### **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

14.1 SPT information is shared with third parties on a limited and managed basis in line with legislation and SPT policy. Any information received from partner organisations is subject to strict access controls.

#### **Evidence:**

1. Data Protection Policy.
2. Data Protection Information Notice.
3. SPT CCTV Guidance.

#### **Future Development:**

There are no planned future developments for Element 14. However, this policy will be regularly reviewed to ensure it remains fit for purpose.

## List of Appendices and Associated Evidence

<b>Element 1</b>	Covering letter from the Chief Executive of SPT
	Records Management Policy (reviewed April 2016)
<b>Element 2</b>	Covering letter from the Chief Executive of SPT
	Records Management Policy (reviewed April 2016)
	Extracts from Senior Legal Advisor & Senior Committee Officer Job Descriptions
<b>Element 3</b>	Records Management Policy (reviewed April 2016)
	IT and Information Security Policy
<b>Element 4</b>	Overview of the organisational business classification
<b>Element 5</b>	Extract from Minute of Strategy Team Meeting
	IT and Information Security Policy
<b>Element 6</b>	Contract between SPT and Shred-it
	In house shredders specifications
	Certificate of Destruction from External Contractors (Shred-it)
	ICT Equipment Disposal Policy
	IT and Information Security Policy
	Intranet Articles
<b>Element 7</b>	Extract from Minute of Strategy Team Meeting
	Agreement between SPT and the Scottish Railway Preservation Society dated 13 January 2015
	IT and Information Security Policy
<b>Element 8</b>	IT and Information Security Policy
	Internet and Email Policy
	IT User Guide
	Data Movement Guide
	Intranet Articles
<b>Element 9</b>	Data Protection Public Registration
	Data Protection Policy
	IT and Information Security Policy
	Data Protection Information Notice
<b>Element 10</b>	List of vital IT applications and systems
	IT and Information Security Policy
	Business Continuity Plan
<b>Element 11</b>	Sample Partnership report
	Destruction Certificate (IT assets)

<b>Element 12</b>	Details of training/courses attended by designated officers
	Extracts from Senior Legal Advisor and Senior Committee Officer Job Descriptions
	Records Management Policy (reviewed April 2016)
	Working group meetings
<b>Element 13</b>	Working group meetings
	Strategy Group meeting(s)
	Internal Audit (for inclusion in Annual Internal Audit Plan)
<b>Element 14</b>	Data Protection Policy
	Data Protection Information Notice
	SPT CCTV Guidance