



*Dunbartonshire and Argyll & Bute
Valuation Joint Board*

Records Management Plan

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

January 2016

Version 1.1 Final

Version Control

Version	Originator	Summary of Changes	Date
1.0	R Nicol	Finalised version for submission	30/09/2015
1.1	R Nicol	Updated for Keepers interim comments	21/01/2016

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1. Introduction

The Public Records (Scotland) Act 2011 ('the Act') came fully into force in January 2013. The Act requires Dunbartonshire and Argyll and Bute Valuation Joint Board (The Board) 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 agreed with the Keeper of the Records of Scotland ('the Keeper') and reviewed by The Board on an annual basis.

A copy of the Act can be viewed 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:

<http://www.nrscotland.gov.uk/record-keeping/public-records-scotland-act-2011>

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. Records Management Plan

The Board'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.

The Board'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

The Board has provided the Keeper with evidence of policies, procedures, guidance and operational activity on all elements of the RMP.

The RMP is effective from 30/09/2015. It will be reviewed and updated, if required, on an annual basis thereafter.

3. 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 DABVJB covered by the RMP lies with:

Assessor & Electoral Registration Officer for Dunbartonshire and Argyll & Bute	David C Thomson Assessor and Electoral Registration Officer 235 Dumbarton Road Clydebank G81 4XJ
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Evidence:

Letter from Assessor & Electoral Registration Officer

DAB 01

Assessor & ERO Statement of Commitment contained in Element 3 of Records Management Plan

Records Management Policy

DAB 02

Element 2: Operational Records Management Responsibility

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

The individual answerable to senior management and who has operational responsibility for records management within DABVJB covered by the RMP is:

Depute Assessor and ERO	Robert Nicol Depute Assessor and Electoral Registration Officer 235 Dumbarton Road Clydebank G81 4XJ
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Evidence:

Records Management Policy	DAB 02
Performance Management and Development Plan – Robert Nicol 14-15	DAB 03
Performance Management and Development Plan – Robert Nicol 15-16	DAB 04
Job Description Depute Assessor	DAB 05

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 Board's Records Management Policy has been developed 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 (www.dab-vjb.gov.uk).

The Board's commitment to establishing and maintaining effective records management is set out in:-

- (a) The Board's Records Management Policy,
- (b) The statement below from the Assessor and Electoral Registration Officer.

"It is the aim of Dunbartonshire and Argyll & Bute Valuation Joint Board to aid transparency and improve efficiency in all that we do through application of best practice to the management of all of our records.

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 supporting good decision making and enabling change when required*
- *Is easily accessible to users and that the skills and technology are available to achieve this aim*
- *Supports and protects the needs of our stakeholders, including staff, both now and into the future*
- *Is retrievable in case of emergency or disaster*

It is through the adoption of best practice that the full benefits of good records management, as identified in the Board's Records Management Policy, will be realised.

The Public Records (Scotland) Act 2011 emphasises the importance placed on records management in local government bodies. It is our aim to adhere to 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."

The Board 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 The Board 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.

The Board uses three main types of records management systems:

- Manual Filing Systems (where it is necessary to keep paper and other physical records)
- IT applications and databases that store data and process transactions for specific functions (i.e. Valuation for the purposes of Non-Domestic Rating and Council Tax and associated systems and Electoral Registration)
- Storage of electronic documents, including shared and home drives

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

Evidence:

Assessor & ERO Statement of Commitment contained above in Element 3 of Records Management Plan

Letter from Assessor & Electoral Registration Officer DAB 01

Records Management Policy DAB 02

Service Level Agreement DABVJB & West Dunbartonshire Council DAB 06

Element 4: Business Classification

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

The Board has maintained a Retention 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 classification scheme is a functional model which groups related business activities and transactions which are part of the overall functions of the Board.

The business classification scheme is structured in three tiers:

Level 1: functions

Level 2: activities

Level 3: transactions

Evidence:

Retention of Documents and Business Classification Scheme	DAB 07
Data Structure Valuation & IT	DAB 08
Data Structure Project Plan (Updated January 2016)	DAB 09a
West Dunbartonshire Council ICT BCC and RRS	DAB 10
West Dunbartonshire Council HR BCC and RRS	DAB 11

Element 5: Retention Schedule

A 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 of Documents and Business Classification Scheme is as an essential part of our overall Records Management Plan, ensuring that records are kept for no longer than is absolutely necessary and disposed of as appropriate.

A Records Retention Schedule was developed in accordance with the Freedom of Information (Scotland) Act 2002 and has been reviewed and combined with our Business Classification Scheme as part of our Records Management Plan.

The purpose of the Retention of Documents and Business Classification Scheme is to provide consistent instructions on records retention and disposal for all staff who deal with records. The Scheme underpins our Records Management programme.

The Scheme establishes 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.

The Scheme covers all records, regardless of medium or format, which are created or received during the course of business.

It is acknowledged that our current position regarding electronic data could be improved upon and the introduction of a new shared drive along with its implementation plan is to address this weakness. The plan is due to be fully implemented by April 2016.

The Schedule will be formally reviewed annually.

Evidence:

Retention of Documents and Business Classification Scheme	DAB 07
Data Structure Valuation & IT	DAB 08
Data Structure Project Plan (Updated January 2016)	DAB 09a
West Dunbartonshire Council ICT BCC and RRS	DAB 10
West Dunbartonshire Council HR BCC and RRS	DAB 11

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 the Board's records which have reached the end of their retention period and have been identified as suitable for destruction in accordance with the Retention of Documents and Business Classification Scheme

The destruction arrangements have been developed in line with the Board'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, our Campbeltown Office share Argyll and Bute Council's contractor, DS Smith who destroy the waste confidentially. Our Campbeltown records store is located within a dedicated secure area of Argyll and Bute Councils Offices therefore it makes logistical and financial sense to share this service. Our Clydebank office use Shredall. Confidential paper waste is deposited and retained in a secure area pending disposal. Certificates of Destruction are provided

Electronic Hardware is disposed of according to West Dunbartonshire Council's Corporate Information and Communication Technology Acceptable Use & Security Policy (Section 7). Back-up tapes are stored off-site for an agreed period of time in both a four weekly and annual tape back-up cycle and these tapes are then reintroduced into the back-up cycle on an ongoing basis once their retention has expired. If system hardware is to be re-used, then all data and software or machine-readable media are erased and made unrecoverable prior to reuse. If the media is to be destroyed off the Boards premises then policy requires that suitable secure arrangements are in place in relation to transport and possible overnight storage.

Evidence:

Retention of Documents and Business Classification Scheme	DAB 07
DAB IT Strategy	DAB 12
West Dunbartonshire Council's Corporate Information and Communication Technology Acceptable Use & Security Policy.	DAB 13
Invoice from DS Smith	DAB 14
Certificate of Destruction from DS Smith	DAB 15

Invoice and Certificate of Destruction from Shredall	DAB 16
Data Structure Project Plan (Updated January 2016)	DAB 09a
Disposal of Redundant IT Equipment	DAB 36
Disposal Arrangements Guidance	DAB 37

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.

The Electoral Register is supplied to, amongst others, the National Library and National Records of Scotland as per Regulations 96 – 100 of the Representation of the People (Scotland) Regulations 2001. Valuation Rolls and Council Tax lists are also supplied free of charge to the National Records of Scotland and the National Library of Scotland upon Publication.

Principal copies of all Board Papers are held securely within the Boards Clydebank Offices in line with the requirements of the Retention of Documents and Business Classification Scheme.

A memorandum of understanding has been entered into with West Dunbartonshire Council Archives to ensure the transfer and preservation of relevant documents. This covers the transfer of Paper copies of Valuation Joint Board Minutes from the Board's inception until 2009 to the West Dunbartonshire Council Archives for accessioning, cataloguing and permanent storage. Alongside commitments to develop arrangements for the digital transfer of subsequent minutes and the notification to East Dunbartonshire Council and Argyll and Bute Council of the transfer.

Evidence:

Distribution List Electoral Registration	DAB 17
Distribution List Valuation Roll and Council Tax List	DAB 18
Retention of Documents and Business Classification Scheme	DAB 07
Memorandum of understanding between WDC & DABVJB	DAB 31

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.

The Board's IT network is supplied and managed by West Dunbartonshire Council. All users of the network including the Board's staff are required to follow West Dunbartonshire Council's Corporate Information and Communication Technology Acceptable Use & Security Policy. The Board also has an IT Strategy which includes information on the Security of our systems.

In addition to this the Board has also enacted a Visitor Access Policy to ensure the integrity of paper records held within our premises.

Securing information assets, and in particular records, will help to fulfil legislative responsibilities, safeguard the Board'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 the Board's Policies and Strategies outlined above.

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

Core Training has been devised for all The Board's staff and this includes an annual refresher of both Information Security and Information Management Training.

Procedures and processes are in place to deal with threats, risks and breaches of security.

Evidence:

Data Protection Policy	DAB 19
West Dunbartonshire Council's Corporate Information and Communication Technology Acceptable Use & Security Policy.	DAB 13
Visitor Access Policy	DAB 20
DAB IT Strategy	DAB 12
DAB Core Training	DAB 21
Screenshot from WDC elearn	DAB 22
Screenshot from DABVJB Intranet	DAB 23

Element 9: Data Protection

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

The Board 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.

The Board 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, the Board 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 is: **Z697104X**

As Part of the Board’s Core Training, annual refresher training is provided in respect of Information Security and Information Management. Both these online courses include an element of Data Protection training

Evidence:

Data Protection Policy	DAB 19
DAB Core Training	DAB 21
Screenshot from DABVJB Intranet	DAB 23

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. In addition to this the IT Strategy outlines our Disaster Recovery arrangements from an IT perspective including the identification of vital records and the back-up processes involved. Primary and Disaster Recovery servers are located in separate buildings. Full details of this can be found within the IT Strategy

The IT Strategy is subject to regular review by the IT Team and the Business Continuity Plan is reviewed by the Depute Assessor and regularly presented to the Management Team.

Our Electoral Registration software is subject to an ESCROW Agreement to protect the Board if the supplier were to go out of business

Evidence:

Business Continuity Plan Redacted version	DAB 24
DAB IT Strategy	DAB 12
ESCROW Agreement	DAB 25

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.

It is recognised that, at present, the Board does not have comprehensive procedures in place in relation to audit trails covering all transactions undertaken.

Paper Non-Domestic and Council Tax records are stored in Valuation Roll or Council Tax List order, within a secure area in terms of the Visitor Access Policy, however there is no audit trail of who has removed the file left within the filing system when a file is being worked on. In practice due to the allocation of work by geographic area this does not cause a problem, however it is recognised that the system could and will be improved by the introduction of a recording mechanism to ensure that there is a history of who has removed and returned a file maintained within the system. We will initially target Non-Domestic filing for this task as this is the area with the greatest recurrent usage of files. Details of the proposed process can be found in Evidence Item 32 and our commitment to implementation can be seen by it being an agenda item on our Admin staff meeting Evidence Item 33. The keeper will be kept informed of progress with this project.

During 2014/15 The Board began a project to create a new file share that will serve our Clydebank and Campbeltown Offices. It is intended that this file share will replace the current drive structures which have grown organically with minimal permission levels attached. The phased implementation of this file structure has begun with the Valuation Sections with a defined structure and permission levels being established along with a naming convention. The Data Structure Project Plan gives a timeline of the roll out of this development with a target of April 2016 for it to cover all our business areas.

At present, electronic systems such as our Electoral Registration Management System are able to provide audit trails for electronic records.

Evidence:

Data Structure Valuation & IT	DAB 08
Data Structure Project Plan	DAB 09a
ND Paper File Audit - Proposed Process	DAB 32
Agenda Admin Meeting 20 th January 2016	DAB 33
New Data Structure Non Domestic Naming Convention	DAB 34

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 includes objectives to improve staff understanding and knowledge of records management with information and make appropriate training available.

All staff within the Board must complete mandatory online training annually in Information Security and Information Management, both these courses include information on Data Protection.

The Depute Assessor, who has operational Records Management Responsibility has carried out a series of information sessions with staff and will continue to do these when appropriate.

The Depute Assessor has also attended and participated in a number of seminars and workshops run by both National Records of Scotland and other training providers. He also has an annual Performance Management and Development Plan which was introduced in 2014, each year since then has had reference to Public Records.

Evidence:

Records Management Policy	DAB 02
Note of Seminars and Workshops attended and information sessions given	DAB 26
Performance Management and Development Plan R Nicol 14 -15	DAB 03
Performance Management and Development Plan R Nicol 15 -16	DAB 04
Job Description Depute Assessor	DAB 05

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

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

Responsibility	Governance/Scrutiny Role
Depute Assessor	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.
Management Team	Approval of the plan and associated strategies and policies

At present, arrangements are in place to monitor, self-audit and report on performance on an on-going basis through the Management Team. Elements of the Plan that are subject to improvement plans will be reviewed more regularly to ensure that the improvement plans are implemented and are providing solutions that are fit for purpose.

In future the ARMS (Archives and Records Management Services) Quality Improvement Framework could provide the basis for setting key outcomes and performance indicators for archives and records management services, however any self-assessment template will require to be proportionate to our size and risk profile. Particular areas that will be subject to review first will be those subject to an improvement plan, including a review of the operation of new Drive Structure which will take place in May 2016. The Boards Archiving arrangements will also be reviewed by January 2019 in line with the Memorandum of Understanding.

Evidence:

Records Management Policy

DAB 02

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Management Team Agenda	DAB 27
Service Calendar 15 16 December update	DAB 35
Data Structure Project Plan	DAB 09a
Memorandum of understanding between WDC & DABVJB	DAB 31
Service Calendar 15 16 December 2015 Update	DAB 35

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 the Board’s information is shared with a third party. Alternatively the Board will receive confidential information from partner organisations. Where such data sharing is not provided for in statute, appropriate agreements are entered into to ensure confidentiality of the information.

Evidence:

Data Sharing Agreement ERO & EDC RO	DAB 28
Data Sharing Protocol DABVJB Y Voters	DAB 29
Data Sharing Agreement Flood re	DAB 30

4. List of supporting evidence

Specific to the 14 Elements of the Plan

Letter from Assessor & Electoral Registration Officer	DAB 01
Records Management Policy	DAB 02
Performance Management and Development Plan R Nicol 14-15	DAB 03
Performance Management and Development Plan R Nicol 15-16	DAB 04
Job Description Depute Assessor	DAB 05
Service Level Agreement DABVJB and West Dunbartonshire Council	DAB 06
Retention of Documents and Business Classification Scheme	DAB 07
Data Structure Valuation & IT	DAB 08
Data Structure Project Plan (updated January 2016)	DAB 09a
West Dunbartonshire Council ICT BCC and RRS	DAB 10
West Dunbartonshire Council HR BCC and RRS	DAB 11
DAB IT Strategy	DAB 12
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Data Sharing Agreement Flood re	DAB 30
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Agenda Admin Meeting 20 th January 2016	DAB 33
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